



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

9/14/2016

Certified Mail

Weston Threeton  
 Rover Pipeline - Defiance Compressor Station  
 1300 Main Street  
 Houston, TX 77002

Yes	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
Yes	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
Yes	MODELING SUBMITTED
No	MAJOR GHG
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL  
 Facility ID: 0320012013  
 Permit Number: P0118479  
 Permit Type: Initial Installation  
 County: Defiance

Dear Permit Holder:

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

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

**How to appeal this permit**

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

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

## **How to save money, reduce pollution and reduce energy consumption**

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: [www.ohioairquality.org/clean\\_air](http://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](http://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](http://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, Northwest District Office at (419)352-8461 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



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

Cc: U.S. EPA  
Ohio EPA-NWDO; Michigan; Indiana



## Response to Comments

Facility ID:	0320012013
Facility Name:	Rover Pipeline - Defiance Compressor Station
Facility Description:	Natural Gas Compressor Station
Facility Address:	0.1mi east of OH-66 S on Banner School Rd. Defiance, OH 43512 Defiance County
Permit:	P0118479, Permit-To-Install - Initial Installation
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the Crescent-News on 05/13/2016. The comment period ended on 06/27/2016.	
Hearing date (if held)	06/22/2016
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.

**Agency Contacts for this Project:**

Division Contact: Jeffrey Skebba, DAPC, (419) 373-3128, [Jeffrey.Skebba@epa.ohio.gov](mailto:Jeffrey.Skebba@epa.ohio.gov)  
 Public Involvement Coordinator: Darla Peelle, (614) 644-2160, [Darla.Peelle@epa.ohio.gov](mailto:Darla.Peelle@epa.ohio.gov)

**Comment 1: Six statements were received in support of the compressor station.**

**Response 1:** No response necessary.

**Comment 2: Citizens had concerns about the compressor station being built within two miles of a school, and wanted the station to be relocated. There were also concerns about the safety of the station.**

**Response 2:** Ohio EPA does not have authority to regulate siting and safety concerns. These questions should be directed to The Federal Energy Regulatory Commission (FERC) at (202) 502-8004 or toll-free at (866) 208-3372.



**Comment 3:** Citizens expressed concerns about the health and environmental effects of the compressor station on the community. There were specific concerns about greenhouse gases, equipment leaks and toxins.

**Response 3:** Ohio EPA has a legal obligation to evaluate proposed sources and determine whether the applicant has the ability to comply with all applicable state and federal air pollution control regulations. The Defiance Compressor Station air permit documents what the proposed sources must do in order to comply with these regulations. The air permit is divided into different emissions units that have pollutant-specific emission limitations and control measures that are based on state and federal rules. Compliance with these limitations and measures are based on operational restrictions, monitoring, record keeping, reporting and testing requirements that are listed in the permit. As long as the emission sources meet the permit terms and conditions, the potential emissions are not expected to cause adverse health and welfare effects.

The emission limits established through the permit are protective of human health and welfare. Modeling was performed on pollutants of concern, including air toxics, which demonstrated that there would not be health impacts to the community. The largest source of emissions from the compressor stations is the compressor engines, which are required to be tested for emissions every 8,760 hours of engine operation or three years, whichever comes first. Compressor engines also have continuous monitors for the inlet temperature and pressure drop on the catalyst to verify proper operation. Any methane leaks from the compressor station components must be monitored under the facility's quarterly fugitive emissions monitoring program and the weekly audio, visual and olfactory checks. The quarterly checks are performed using either an analyzer or optical gas imaging equipment and are required to be performed in accordance with the requirements in the Leak Detection and Repair Program as specified in the permit. Ohio EPA will monitor ongoing compliance with the air permit through on-site compliance inspections, test observations and complaint investigations, in addition to the company's quarterly and annual reporting requirements.

**Comment 4:** A citizen expressed concern that no one is tracking the cumulative loads of air pollution from all fracking facilities in Ohio. Citizen requested that all fracking facilities be looked at as a whole, and that isolating individual facilities for permit issuance should not be allowed.

**Response 4:** By law, Ohio EPA does not issue air pollution control permits to groups of facilities, based on collective emissions. Each permit application for an individual facility is reviewed separately to ensure each proposed project will comply with Ohio and federal air pollution control regulations, since the Clean Air Act establishes this procedure. Ohio EPA's Central Office does track emissions through the Emission Inventory System on a state-wide basis for air quality planning purposes to ensure compliance with Ohio's State Implementation Plan (SIP). Thousands of pollutant-emitting facilities in Ohio are required to submit fee emission reports. In addition, air quality data is collected from numerous monitoring stations throughout Ohio. Further, air quality modeling is conducted by Ohio EPA on an ongoing basis to determine compliance with National Ambient Air Quality Standards established by U.S. EPA.

**Comment 5:** Citizens claimed that Ohio EPA is serving the fracking industry instead of protecting the environment and Ohioans, and that Ohio EPA should deny the permit.



- Response 5: Pursuant to ORC 3704.03(F)(2)(a), *“No installation permit shall be issued except in accordance with all requirements of this chapter and rules adopted thereunder. No application shall be denied or permit revoked or modified without a written order stating the findings upon which denial, revocation, or modification is based.”* Ohio EPA has no findings that support a denial of the permit application for this source; therefore, Ohio EPA is legally obligated to issue the air permit because the potential air contaminants from this facility are within the emission thresholds allowed under state and federal air pollution control regulations.
- Comment 6: A citizen stated that no one has calculated the health care costs they feel would be triggered should Rover be issued the air permit.**
- Response 6: As shown in Response 3 above, Ohio EPA has a legal obligation to evaluate proposed sources and determine whether or not they are able to comply with all applicable state and federal air pollution control regulations. However, Ohio EPA has no regulatory authority to calculate health care costs associated with any permit issuance.
- Comment 7: A citizen stated that no one has calculated the number of additional ozone action days that will be caused by the Rover compressor station.**
- Response 7: Ozone is not directly emitted from facilities. It is a pollutant that is formed in the atmosphere by a combination of nitrogen oxides, volatile organic compounds and warm air from the sun. It is transported in the atmosphere on a regional basis, and some ozone is also due to mobile sources such as automobile and truck exhaust, trains and off-road vehicles used in construction. Therefore, it cannot be ascertained what impact any individual facility has on ozone concentrations. Ohio EPA conducts monitoring for ozone with numerous monitors state-wide from April 1 through October 31 each year, and provides daily monitoring data to the public as needed.
- Comment 8: Citizens stated that no one is looking at the cumulative effect of greenhouse gas (GHG) emissions on the climate to mitigate the effects. Before more GHG emissions are permitted to be released, the Ohio EPA should calculate the cumulative effects on climate change before allowing additional fracking facilities to provide natural gas to the industry.**
- Response 8: No criteria pollutant (carbon monoxide, nitrogen oxides, particulate matter, sulfur dioxide and volatile organic compounds) potential emissions for this project will exceed the Prevention of Signification Deterioration (PSD) threshold of 250 tons per year; therefore, per current U.S. EPA policy document on the May 2010 Tailoring Rule, Ohio EPA is not required to review GHG emissions for this project.
- Comment 9: A citizen stated that the least the Ohio EPA could do to protect the populace would be to require using best available technology (BAT) for fracking-related projects.**
- Response 9: This citizen's statement is not valid. Ohio EPA has placed BAT emissions limitations in the permit as required by Ohio Senate Bill 265 for all emissions units that will have criteria pollutant emissions greater than 10 tons per year. This includes emissions units P003 through P006 – four natural gas compressor engines.



**Comment 10:** Citizens expressed concerns that the natural gas proposed to be moved through the piping system is not conventional natural gas due to its origin from fracking and has radioactive material contained in the natural gas. Data from a Pennsylvania facility was mentioned, claiming that four natural gas samples contained radon concentrations ranging from 28.8 picocuries per liter (pCi/l) to 58.1 pCi/l, with fence-line monitors measuring up to 0.8 pCi/l. Health effects of exposure to radioactive materials such as radon should be evaluated further before issuing a permit.

Response 10: The Ohio EPA is not aware that the compressor station will emit radon gas and/or radioactive particulate matter. The natural gas carried in the Rover pipeline is residential-quality natural gas that meets the natural gas quality specification of its downstream customers. Rover will monitor all incoming gas into the pipeline with strict metering, regulation and filtering methods. U.S. EPA guidelines for radon are designated specifically for indoor air exposure for gas leaking into the living spaces of residences. Outdoor radon gas quickly disperses into the atmosphere for greatly reduced exposures, similar to the average Ohio ambient air exposure. Ohio EPA has no reason to suspect any radon gas emitted from this facility will behave any differently.

**Comment 11:** A citizen expressed concerns about drainage problems and changes to soil elevations that may result from construction of the pipeline leading up to the compressor station.

Response 11: Ohio EPA has no regulatory authority for evaluating impacts to soil and drainage.

**Comments from U.S. EPA (page numbers and emissions are specific to Mainline CS-1 permit, but comments apply to all Rover permits in general):**

**Comment 12:** Permit conditions 3.g(1) on page 26 of 36 and 4.g(1) on page 33 of 36, as well as item 4 of the Permit Strategy Write-Up, state that some of the source's emission units may be subject to 40 CFR Part 60, Subpart OOOOa once that rule's proposed amendments are finalized. The proposed amendments were finalized on May 12, 2016, so please indicate whether any of the emission units are subject to this New Source Performance Standard; if so, please add the applicable requirements to the permit.

Response 12: This term has been removed. 40 CFR Part 60, Subpart OOOOa is not applicable to this compressor station because the company has submitted information that demonstrates they commenced construction prior to September 18, 2015 (the date specified in 40 CFR 60.5365a).

**Comment 13:** Permit condition 1.c(1) on page 14 of 36 contains the following vague language, "... by conducting routine operation and maintenance activities in a manner consistent with safety and good air pollution control practices." To improve the enforceability of the permit language, please specify the safety and good air pollution control practices for this source and list them in the permit as permit requirements.

Response 13: This language was intended to encourage the company to minimize blowdown and starter vent frequency to the extent practical. Due to the dryness of the gas and low VOC content of the material released, no further permit requirements are necessary.

**Comment 14:** For the PIGGING Operation on page 17 of 36, please consider the information in the attached EPA Discussion Draft "*Quantifying the Potential Impacts of Natural Gas Condensate Holdup on Uncontrolled Volatile Organic Compound Emissions from Pig Receivers During Depressurization in Wet Gas Gathering Operations*" (Attachment A)



for use in the compliance method listed in permit condition 2.f(1)(a) on page 19 of 36 of the permit. Condensed liquids may be present in the pig receiver and volatilize as pressure in the pig receiver is reduced from pipeline pressure to atmospheric pressure during the process of pig retrieval. These volatilized liquids are ultimately emitted to the atmosphere, and can comprise a significant portion of total volatile organic compounds emitted during pigging operations, especially from pipelines that transport wet gas.

Response 14: The Rover system will receive and transport dry, pipeline-quality gas throughout its transmission lines. The gas received will be free of water and hydrocarbons in the liquid state, and shall be less than 1,100 Btu per cubic foot. Due to the dryness of the gas, no liquid condensate is expected in the pig receivers. In reviewing the EPA Discussion Draft "Quantifying the Potential Impacts of Natural Gas Condensate Holdup on Uncontrolled Volatile Organic Compound Emissions from Pig Receivers During Depressurization in Wet Gas Gathering Operations," it is apparent that the discussion is focused on wet, production and midstream gathering systems. The VOC weight percentages in the two examples within the study ranged from 22-25 percent. In contrast, Rover's anticipated gas stream represented in its applications is 2 percent VOC by weight.

Comment 15: **Permit condition 3.c.1(i) on page 21 of 36 requires a leak detection and repair (LDAR) program for the process equipment leaks, and that it shall follow the monitoring and record-keeping requirements described in permit condition 5.d, but permit condition 5.d (on page 35 of 36) pertains to the amount of throughput and emissions from each slop/wastewater tank. Please explain how that relates to the LDAR program for the processes equipment leaks.**

Response 15: This language has been revised to the following:

The program shall follow the monitoring and record keeping requirements described in paragraphs d)(3) and d)(4) of this permit.

Comment 16: **It's unclear whether this permit is a major, minor or synthetic minor source permit because there is contradictory information on the permit's cover page and the Permit Strategy Write-Up. The table on the permit cover page indicates that the permit is neither a Prevention of Significant Deterioration major source nor a netting permit, but items 1, 4 and 7 in the Permit Strategy Write-Up contradicts that by indicating: both a synthetic minor determination and a netting determination has been made for this source (item 1); engine emissions exceed major source thresholds (item 4); and that the nitrogen oxide (NOx) emissions are 103.69 tons per year (tpy) and the formaldehyde emissions are 13.14 tpy (item 7), indicating that the source is major for NOx and hazardous air pollutants (formaldehyde). Please clarify the status of the source/permit.**

**If it is major, the permit must go through major New Source Review. If the source is synthetic minor, restrictions must be added to the permit, and if it is a netting permit, the draft permit must contain the netting analysis.**



Response 16: The Defiance compressor station is major for Title V purposes, not New Source Review. This is stated correctly on the permit's cover page. The Permit Strategy Write-Up will be revised to make it clear that the source exceeds only the Title V thresholds. The check boxes on the Permit Strategy Write-Up document are not checked for synthetic minor or netting, which indicates that they do not apply.



**FINAL**

**Division of Air Pollution Control  
Permit-to-Install  
for  
Rover Pipeline - Defiance Compressor Station**

Facility ID:	0320012013
Permit Number:	P0118479
Permit Type:	Initial Installation
Issued:	9/14/2016
Effective:	9/14/2016





**Division of Air Pollution Control**  
**Permit-to-Install**  
for  
Rover Pipeline - Defiance Compressor Station  
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**Final Permit-to-Install**  
Rover Pipeline - Defiance Compressor Station  
**Permit Number:** P0118479  
**Facility ID:** 0320012013  
**Effective Date:** 9/14/2016

## Authorization

Facility ID: 0320012013  
Facility Description: Natural Gas Compressor Station  
Application Number(s): A0052567  
Permit Number: P0118479  
Permit Description: Initial installation permit for an oil/gas compressor station consisting of two (2)-8,180 horsepower (hp) and two (2)-4,735 hp natural gas compressors; pigging operations, slop and waste-water truck loading, unpaved roadways and parking areas, and the associated fugitive emissions from engine blowdown/start-up events and equipment leaks.  
Permit Type: Initial Installation  
Permit Fee: \$2,000.00  
Issue Date: 9/14/2016  
Effective Date: 9/14/2016

This document constitutes issuance to:

Rover Pipeline - Defiance Compressor Station  
.1mi W of OH-66 S on Banner School Rd  
Defiance, OH 43512

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

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

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

The above named entity is hereby granted a Permit-to-Install for the emissions unit(s) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

  
Craig W. Butler  
Director



## Authorization (continued)

Permit Number: P0118479

Permit Description: Initial installation permit for an oil/gas compressor station consisting of two (2)-8,180 horsepower (hp) and two (2)-4,735 hp natural gas compressors; pigging operations, sloop and waste-water truck loading, unpaved roadways and parking areas, and the associated fugitive emissions from engine blowdown/start-up events and equipment leaks.

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

<b>Emissions Unit ID:</b>	<b>F001</b>
Company Equipment ID:	ROAD
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P008</b>
Company Equipment ID:	BDSV
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P801</b>
Company Equipment ID:	FUG
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P802</b>
Company Equipment ID:	PIGGING
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

**Group Name: 4,735 hp Stationary ICE**

<b>Emissions Unit ID:</b>	<b>P005</b>
Company Equipment ID:	COMP3
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P006</b>
Company Equipment ID:	COMP4
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

**Group Name: 8,180 hp Stationary ICE**

<b>Emissions Unit ID:</b>	<b>P003</b>
Company Equipment ID:	COMP1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P004</b>
Company Equipment ID:	COMP2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

**Group Name: Truck Loading**

<b>Emissions Unit ID:</b>	<b>J001</b>
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**Final Permit-to-Install**  
Rover Pipeline - Defiance Compressor Station  
**Permit Number:** P0118479  
**Facility ID:** 0320012013  
**Effective Date:** 9/14/2016

Company Equipment ID:	LOADING1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>J002</b>
Company Equipment ID:	LOADING2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



**Final Permit-to-Install**  
Rover Pipeline - Defiance Compressor Station  
**Permit Number:** P0118479  
**Facility ID:** 0320012013  
**Effective Date:** 9/14/2016

## **A. Standard Terms and Conditions**

**1. Federally Enforceable Standard Terms and Conditions**

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
  - (1) Standard Term and Condition A.2.a), Severability Clause
  - (2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements
  - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
  - (4) Standard Term and Condition A.9., Reporting Requirements
  - (5) Standard Term and Condition A.10., Applicability
  - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
  - (7) Standard Term and Condition A.14., Public Disclosure
  - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
  - (9) Standard Term and Condition A.16., Fees
  - (10) Standard Term and Condition A.17., Permit Transfers

**2. Severability Clause**

- a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

**3. General Requirements**

- a) Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.
- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally

enforceable terms and conditions of this permit.

- c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

#### **4. Monitoring and Related Record Keeping and Reporting Requirements**

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
  - (1) The date, place (as defined in the permit), and time of sampling or measurements.
  - (2) The date(s) analyses were performed.
  - (3) The company or entity that performed the analyses.
  - (4) The analytical techniques or methods used.
  - (5) The results of such analyses.
  - (6) The operating conditions existing at the time of sampling or measurement.
- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
  - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Northwest District Office.

- (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Northwest District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.
  - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the Ohio EPA DAPC, Northwest District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
  - (4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

## **5. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Northwest District Office in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

## **6. Compliance Requirements**

- a) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the appropriate Ohio EPA District Office or contracted local air agency, and/or any

other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the electronic signature date shall constitute the date that the required application, notification or report is considered to be "submitted". Any document requiring signature may be represented by entry of the personal identification number (PIN) by responsible official as part of the electronic submission process or by the scanned attestation document signed by the Authorized Representative that is attached to the electronically submitted written report.

Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a Responsible Official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

- b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
- (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
  - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
  - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c) The permittee shall submit progress reports to the Ohio EPA DAPC, Northwest District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

## **7. Best Available Technology**

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

**8. Air Pollution Nuisance**

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

**9. Reporting Requirements**

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Northwest District Office.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Northwest District Office. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

**10. Applicability**

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s) not exempt from the requirement to obtain a Permit-to-Install.

**11. Construction of New Sources(s) and Authorization to Install**

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the

Director within a reasonable time before the termination date and the permittee shows good cause for any such extension.

- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update electronically will constitute notifying the Director of the permanent shutdown of the affected emissions unit(s).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

Unless otherwise exempted, no emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31 and OAC Chapter 3745-77 if the restarted operation is subject to one or more applicable requirements.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

## 12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if operation of the proposed new or modified source(s) as authorized by this permit would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d) must be obtained before operating the source in a manner that would violate the existing Title V permit requirements.

**13. Construction Compliance Certification**

The applicant shall identify the following dates in the "Air Services" facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

**14. Public Disclosure**

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

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

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

**16. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

**17. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in "Air Services" once the transfer is legally completed. The change must be submitted through "Air Services" within thirty days of the ownership transfer date.

**18. Risk Management Plans**

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

**19. Title IV Provisions**

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.



**Final Permit-to-Install**  
Rover Pipeline - Defiance Compressor Station  
**Permit Number:** P0118479  
**Facility ID:** 0320012013  
**Effective Date:** 9/14/2016

## **B. Facility-Wide Terms and Conditions**



1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
  - a) None.
2. The Ohio EPA has determined that this facility is subject to the requirements of 40 CFR, Part 63, Subpart ZZZZ - National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines. Although Ohio EPA has determined that this Generally Available Control Technology NESHAP (GACT) applies, at this time Ohio EPA does not have the authority to enforce this standard. Instead, U.S. EPA has the authority to enforce this standard. Please be advised, that all requirements associated with this rule are in effect and shall be enforced by U.S. EPA. For more information on the area source rules, please refer to the following U.S. EPA website: <http://www.epa.gov/ttn/atw/area/arearules.html>.
3. The following emissions units contained in this permit are subject to 40 CFR, Part 60, Subpart JJJJ - Standards of Performance for Stationary Spark Ignition Internal Combustion Engines: P003 – P006. The complete NSPS requirements may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the Ohio EPA Northwest District Office.
4. Air contaminant sources that qualify as de minimis under OAC rule 3745-15-05, or are exempt under OAC rule 3745-31-03(A)(1) or (4) 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**  
Rover Pipeline - Defiance Compressor Station  
**Permit Number:** P0118479  
**Facility ID:** 0320012013  
**Effective Date:** 9/14/2016

## **C. Emissions Unit Terms and Conditions**

**1. F001, Unpaved Roads and Parking Areas**

**Operations, Property and/or Equipment Description:**

Unpaved Roads and Parking Areas

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Develop and implement a site-specific work practice plan designed as described in paragraph d)(1) below to minimize or eliminate fugitive dust emissions.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) Work Practice Plan

The permittee shall develop and implement a site-specific work practice plan designed to minimize or eliminate fugitive dust from the permittees unpaved roadways and parking areas. This work practice plan shall include, at a minimum, the following elements:

a. An identification of each roadway or parking area, or segment of roadway or parking area, for which the plan applies. The permittee can select whether to develop a plan based on segments or entire roads.

b. A determination of the frequency that each roadway, parking area or segment will be inspected to determine if additional control measures are needed. The frequency of inspection can either be common for all segments of the roadway or parking areas or may be identified separately for various segments of the roadway or parking areas.



- c. The identification of the record keeping form/record that will be used to track the inspection and treatment of the roadways. This form/record should include, at a minimum, the following elements:
  - i. roadway, parking area, or segment inspected;
  - ii. date inspected;
  - iii. name of employee responsible for inspection;
  - iv. result of the inspection (needs to be treated or does not need to be treated);
  - v. a description of why no treatment was needed;
  - vi. date treated;
  - vii. name of employee responsible for roadway, parking area, or segment treatment; and
  - viii. method used to treat the roadway, parking area, or segment.
  
- d. A description of how and where the records shall be maintained.

The permittee shall begin using the Work Practice Plan within 30 days from the date Ohio EPA approved the initial plan. As needs warrant, the permittee can modify the Work Practice Plan. The permittee shall submit a copy of proposed revisions to the Work Practice Plan to the appropriate District Office or Local Air Agency (DO/LAA) for review and approval. The permittee can begin using the revised Work Practice Plan once the appropriate DO/LAA has approved its use.

(2) Work Practice Plan Inspections

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

(3) Work Practice Plan Record Keeping

The permittee shall maintain records of the following information:

- a. the records required to be collected under the Work Practice Plan; and
- b. the date and reason any element of the Work Practice Plan was not implemented.



The permittee shall maintain these records in accordance to the Standard Terms and Conditions of Part A of this permit.

e) Reporting Requirements

- (1) Within 30 days from the final issuance of this permit, the permittee shall submit their proposed Work Practice Plan to the appropriate DO/LAA.
- (2) The permittee shall submit quarterly deviation reports that identify any of the following occurrences:
  - a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and
  - b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.
- (3) The deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
  - a. None.

g) Miscellaneous Requirements

- (1) None.

**2. P008, Blowdowns and Starter Vents**

**Operations, Property and/or Equipment Description:**

Blowdowns and Starter Vents

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) June 30, 2008	Volatile organic compound (VOC) emissions from all blowdown/starter vents shall not exceed 0.04 ton/month averaged over a 12-month rolling period.  See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	See b)(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) rule 3745-31-05(A)(3)(a)(ii) (the less than 10 tpy BAT exemption) into the Ohio State Implementation Plan (SIP).

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

The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the uncontrolled potential to emit is less than 10 tons/year.

c) Operational Restrictions

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

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information:
  - a. number and the type of each blowdown/starter vent;
  - b. the total VOC percentage in the gas stream using the most recent representative analysis;
  - c. the estimated volume of gas emitted from all blowdowns/starter vents for each month, in scf; and
  - d. the rolling, 12-month summation of the VOC emissions, in ton/month, from all blowdowns/starter vents as calculated in f)(1)a.

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (2) The permittee shall submit annual reports by January 31 of each year that identify the estimated annual volume of natural gas released from all blowdown/starter vents.  
  
These reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.
- (3) If, after the first two full years of operation, the annual reports demonstrate that the volume of gas released from blowdown/starter vent activities has not led to an exceedance of the annual VOC emission limitation, the permittee may, upon receipt of written approval from the Ohio EPA Northwest District Office, discontinue this reporting requirement.

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 0.04 ton/month averaged over a 12-month rolling period.
  - b. Applicable Compliance Method:  
  
This emission limitation is based on the predicted maximum annual blowdown/starter vent occurrences. Compliance with the VOC emission limitation shall be demonstrated by the summation of monthly emissions from blowdown and starter vents and based upon the following calculations using the inputs provided in the application and the record keeping requirements in d)(1):



$$\text{VOC (ton/month)} = B_{\text{total}} + SV_{\text{total}}$$

where:

$B_{\text{total}}$  = total blowdown emissions, in tons; and  
 $SV_{\text{total}}$  = total starter vent emissions, in tons.

Emissions shall be calculated using the following equation:

$$(\text{VGSE})/\text{CF} = \text{total emissions from either blowdown or starter vents}$$

where:

V = maximum VOC percentage in gas stream, wt % (based on the latest gas stream representative analysis);  
G = gas stream density, lb/scf, calculated by multiplying the specific gravity of the gas stream, by the MW (lb/mole) by the conversion (1 lb-mol/ 379.4 scf);  
S = estimated volume of gas in the blowdown or starter vent, scf;  
E = total events per month; and  
CF = conversion factor (2,000 lbs/ton).

g) Miscellaneous Requirements

- (1) None.



**3. P801, Equipment Leaks: Fugitive emissions from process equipment**

**Operations, Property and/or Equipment Description:**

Fugitive emissions from: valves, seals, flanges, connectors and open-ended lines

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) June 30, 2008	Fugitive volatile organic compound (VOC) emissions shall not exceed 0.22 ton/month averaged over a 12-month rolling period.  See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	See b)(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) rule 3745-31-05(A)(3)(a)(ii) (the less than 10 tpy BAT exemption) into the Ohio State Implementation Plan (SIP).

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

The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the uncontrolled potential to emit is less than 10 tons/year.

c) Operational Restrictions

(1) Ancillary Equipment Leak Detection and Repair Program

The permittee shall develop and implement a leak detection and repair program designed to monitor and repair leaks from ancillary equipment covered by this permit, including each pump, compressor seal, pressure relief device, connector, valve, flange,

vent, cover, any bypass in the closed vent system, and each storage vessel in VOC service. As noted below in d)(2)b., a component is considered not in VOC service if it can be determined that the VOC content of the process fluid, which is contained in or contacts the piece of equipment, can be reasonably expected never to exceed 10% by weight. This program shall meet the following requirements:

- a. Leaks shall be detected by the use of either a “Forward Looking Infra-Red” (FLIR) camera or an analyzer meeting U.S. EPA Method 21 of 40 CFR Part 60, Appendix A.
  - b. An initial monitoring shall be completed within 90 days of startup and quarterly thereafter for a period of four consecutive quarters (1 year).
  - c. If following the initial four consecutive quarters, less than or equal to 2.0% of the ancillary equipment are determined to be leaking during the most recent quarterly monitoring event, then the frequency of monitoring can be reduced to semi-annual.
  - d. If following two consecutive semi-annual periods, less than 2.0% of the ancillary equipment are determined to be leaking during the most recent semi-annual monitoring event, then the frequency of the monitoring can be reduced to annual.
  - e. If more than or equal to 2.0% of the ancillary equipment are determined to be leaking during any one of the semi-annual or annual monitoring events, then the frequency of monitoring shall be returned to quarterly.
  - f. The program shall require the first attempt at repair within five (5) calendar days of determining a leak.
  - g. The program shall require that the leaking component is repaired within 30 calendar days after the leak is detected.
  - h. The program shall allow for the delayed repair of a leaking component following the language found in 40 CFR 60.5416(c)(5).
  - i. The program shall follow the Monitoring and Record Keeping requirements described in paragraphs d)3 and d)(4) of this permit.
- (2) In the event that a leak or defect is detected in the cover, closed vent system, process equipment, or control device, the permittee shall make a first attempt at repair no later than 5 calendar days after the leak is detected. Repair shall be completed no later than 30 calendar days after the leak is detected as allowed in 40 CFR 60.5416(c)(4). Any delay of repair of a leak or defect shall meet the requirements of 40 CFR 60.5416(c)(5).
- d) **Monitoring and/or Recordkeeping Requirements**
- (1) The permittee shall perform weekly audio, visual and olfactory (AVO) checks to detect possible leaks from pressure relief valves and equipment. Results of the AVO checks shall be maintained in an operations log and include the following:
    - a. name of inspector;

- b. date and time of inspection;
  - c. company identification of leaking equipment and/or pressure relief valve;
  - d. estimated/calculated duration of release and/or leak and total emissions; and
  - e. corrective actions taken to minimize/eliminate release/leak.
- (2) Within 180 days of startup, the permittee shall develop a list of components not in VOC service and the information or data used to demonstrate that the equipment is not in VOC service. This can be in the form of:
- a. A written or electronic component log or identification on the facility piping and instrumentation drawings (PID).
  - b. A component is considered not in VOC service if it can be determined that the VOC content of the process fluid, which is contained in or contacts the piece of equipment, can be reasonably expected never to exceed 10% by weight.
- (3) Ancillary Equipment Leak Detection and Repair Program Monitoring and Record Keeping for Programs Utilizing FLIR Camera's
- a. Leaks shall be determined by visually observing each ancillary component through the FLIR camera to determine if leaks are visible.
  - b. The following information shall be recorded during each leak inspection:
    - i. the date the inspection was conducted;
    - ii. the name of the employee conducting the leak check;
    - iii. the identification of any component that was determined to be leaking;
    - iv. the date the first attempt to repair the component was made;
    - v. the reason the repair was delayed following the language found in 40 CFR 60.5416(c)(5);
    - vi. the date the component was repaired and determined to no longer be leaking;
    - vii. the total number of components that are leaking; and
    - viii. the percentage of components leaking, determined as the sum of the number of components for which a leak was detected, divided by the total number of ancillary components capable of developing a leak, and multiplied by 100.
  - c. The permittee shall maintain records that demonstrate the FLIR camera is operated and maintained in accordance with the manufacturer's operation and maintenance instructions.



- d. The records from each inspection and the dates each leak is detected and repaired shall be maintained for at least 5 years and shall be made available to the Director or his representative upon verbal or written request.
- (4) Ancillary Equipment Leak Detection and Repair Program Monitoring and Record Keeping for Programs Utilizing a Method 21 Analyzer

- a. Leaks shall be measured by utilizing U.S. EPA Method 21 (40 CFR Part 60, Appendix A). All potential leak interfaces shall be traversed as close to the interface as possible. The arithmetic difference between the maximum concentration indicated by the instrument and the background level is compared with 500 ppm or 10,000 ppm (as applicable) for determining compliance.
- b. A component is considered to be leaking if the instrument reading is equal to or greater than:

pressure relief device in gas/vapor service	10,000 ppm
pressure relief device in light liquid service	10,000 ppm
pumps in light liquid service	10,000 ppm
compressor seals	500 ppm
sampling connection system*	*
open ended valves or lines**	**
valves in gas/vapor and light liquid service	10,000 ppm
closed vent system	500 ppm
connectors	10,000 ppm
all other ancillary and associated equipment in VOC service	10,000 ppm
must be equipped with a closed-purge, closed-loop, or closed-vent system	
must be equipped with a cap, blind flange, plug, or a second valve	

- c. The following information shall be recorded during each leak inspection:
  - i. the date the inspection was conducted;
  - ii. the name of the employee conducting the leak check;
  - iii. the identification of any component that was determined to be leaking (company ID and component type (flange, pump, etc.);
  - iv. the date the first attempt to repair the component was made;
  - v. the reason the repair was delayed following the language found in 40 CFR 60.5416(c)(5);
  - vi. the date the component was repaired and determined to no longer be leaking;
  - vii. the total number of components that are leaking; and

- viii. the percentage of components leaking, determined as the sum of the number of components for which a leak was detected, divided by the total number of ancillary components capable of developing a leak, and multiplied by 100.
  - d. The permittee shall maintain records that demonstrate the Method 21 analyzer is operated and maintained in accordance with the manufacturer's operation and maintenance instructions.
  - e. In order to calibrate the analyzer, the following calibration gases shall be used:
    - i. zero air, which consists of less than 10 ppm of hydrocarbon in air; and
    - ii. a mixture of air and methane or n-hexane at a concentration of approximately, but less than, 10,000 ppm of methane or n-hexane.
  - f. The records from each inspection and the dates each leak is detected and repaired shall be maintained for at least 5 years and shall be made available to the Director or his representative upon verbal or written request.
- (5) The permittee shall meet all requirements of 40 CFR, Part 98 - Mandatory Greenhouse Gas Reporting, for onshore natural gas transmission, including annual monitoring of fugitive components using leak detection equipment such as optical gas instrument cameras (FLIR) or other approved instruments. Leaks discovered during these surveys will be repaired in a prudent and timely manner.
- e) Reporting Requirements
- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
  - (2) For each inspection that occurred during the year, the permittee shall submit the following information annually from data collected by the ancillary equipment leak detection and repair program:
    - a. the date of the inspection;
    - b. the number of components determined to be leaking;
    - c. the company ID and component type (flange, pump, etc.) of each leaking component;
    - d. the total number of components at the site;
    - e. the percent of components determined to be leaking;
    - f. a list of all components that have not been repaired due to a delay of repair and the reason for the delay; and



- g. a notification indicating if the permittee has changed future inspection frequencies based on the percent of components leaking.

f) Testing Requirements

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

- a. Emission Limitation:

Fugitive VOC emissions shall not exceed 0.22 ton/month averaged over a 12-month rolling period.

Applicable Compliance Method:

Emissions shall be calculated using the emission factors from the Technical Guidance Document for Equipment Leak Fugitives (October, 2000) for components in gas, water and heavy liquid service.

Component Type (# of components) x (emission factor) x % VOC\* = lb/hr

Gas/Vapor Streams:

Connectors (3,689) x 0.000441 lb/hr x % VOC = lb/hr

Valves (919) x 0.00992 lb/hr x % VOC = lb/hr

Flanges (1,271) x 0.00086 lb/hr x % VOC = lb/hr

Compressor seals (30) x 0.0194 lb/hr x % VOC = lb/hr

Relief valves (67) x 0.0194 lb/hr x % VOC = lb/hr

\*where: % VOC = 2.00 per company's analysis

Water/Light Oil Streams:

Connectors (961) x 0.000243 lb/hr x % VOC = lb/hr

Valves (156) x 0.000216 lb/hr x % VOC = lb/hr

Flanges (39) x 0.000006 lb/hr x % VOC = lb/hr

Other components (4) x 0.00055 lb/hr x % VOC = lb/hr

\*where: % VOC = 100 per company's analysis

Heavy Liquid:

Connectors (1,055) x 0.0000165 lb/hr x % VOC = lb/hr

Valves (278) x 0.0000185 lb/hr x % VOC = lb/hr

Pump seals (30) x 0.00113 lb/hr x % VOC = lb/hr

Flanges (88) x 0.00000086 lb/hr x % VOC = lb/hr

\*where: % VOC = 100 per company's analysis

The monthly emissions from ancillary and associated equipment shall be documented from the summation of the calculations listed above, multiplied by (8,760 hours/year), the conversion factor (1 ton/2,000 pounds) and divided by (12 months/year).



**Final Permit-to-Install**  
Rover Pipeline - Defiance Compressor Station  
**Permit Number:** P0118479  
**Facility ID:** 0320012013  
**Effective Date:** 9/14/2016

- g) Miscellaneous Requirements
  - (1) None.

**4. P802, Pigging Operations**

**Operations, Property and/or Equipment Description:**

Pigging Operations

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) June 30, 2008	Fugitive volatile organic compound (VOC) emissions shall not exceed 0.012 ton/month averaged over a 12-month rolling period.  See b)(2)a and b)(2)c.
b.	OAC rule 3745-31-05(A)(3)(ii) June 30, 2008	See b)(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) rule 3745-31-05(A)(3)(a)(ii) (the less than 10 tpy BAT exemption) into the Ohio State Implementation Plan (SIP).

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

The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC from this air contaminant source since the uncontrolled potential to emit for VOC is less than 10 tpy.

c. The permittee shall maintain a written operating manual for pig launching and recovery. The manual shall include, at a minimum, procedures for minimizing the duration and frequency of the pigging activities, and a training program for the operators performing the activities.

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 monthly records of the following information:
  - a. number of pigging events;
  - b. mole % of each VOC component in the gas stream using a representative analysis;
  - c. the maximum total VOC percentage in the gas stream;
  - d. the volume of gas emitted from all pigging for each month, in scf; and
  - e. the rolling, 12-month summation of the VOC emissions, in ton/month, from all pigging as calculated in f)(1)a.

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (2) The permittee shall submit annual reports by January 31 of each year that identify the annual volume of natural gas released from all pigging activities.

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 0.012 ton/month averaged over a 12-month rolling period.

Applicable Compliance Method:

This emission limitation is based on the predicted maximum annual pigging occurrences. Compliance with the VOC emission limitation shall be demonstrated by the summation of monthly emissions from pigging and based



upon the following calculations using the inputs provided in the application and the record keeping requirements in d)(1):

$$\text{VOC (ton/month)} = (\text{VGSE})/\text{CF}$$

where:

V = Maximum VOC percentage in the gas stream, wt % (based on the latest gas stream analysis);

G= gas stream density, lb/scf, calculated by multiplying the specific gravity of the gas stream, by the MW (lb/mole) by the conversion (1 lb-mol/ 379.4 scf);

S = volume of gas in the pigging event, scf;

E = total events per month; and

CF = conversion factor (2,000 lbs/ton).

g) Miscellaneous Requirements

(1) None.

**5. Emissions Unit Group - 8,180 horsepower (hp) Stationary Spark Ignition (SI) Internal Combustion Engines (ICE): P003, P004**

EU ID	Operations, Property and/or Equipment Description
P003	8,180 hp CAT G16CM34 natural gas compressor controlled by an oxidation catalyst
P004	8,180 hp CAT G16CM34 natural gas compressor controlled by an oxidation catalyst

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC 3704.03(T)	<p>Emissions of formaldehyde (CH<sub>2</sub>O) shall not exceed 14 ppmvd at 15% O<sub>2</sub> or emissions of carbon monoxide (CO) shall be reduced by 93% or more.</p> <p>The permittee shall control the emissions of CH<sub>2</sub>O and CO from the stationary RICE exhaust using an oxidation catalyst control device.</p> <p>See c)(1).</p> <p>The requirements specified by this rule are equivalent to the requirements specified in 40 CFR, Part 63, Subpart ZZZZ.</p> <p>Emissions from the stack serving each emissions unit shall not exceed:</p> <p>0.5 g/hp-hr of nitrogen oxides (NO<sub>x</sub>)            0.22 g/hp-hr of CO            0.15 g/hp-hr of volatile organic compound (VOC)</p> <p>See b)(2)a.</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-31-05(A)(3) June 30, 2008	Particulate emissions (PE) from each engine shall not exceed 0.20 ton/month averaged over a 12-month rolling period. See b)(2)b and b)(2)c.
c.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30,2008	See b)(2)d.
d.	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) from the exhaust stack serving each emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
e.	OAC rule 3745-17-11(B)	PE shall not exceed 0.062 lb/mmBtu of actual heat input.
f.	OAC rule 3745-18-06(G)	These emissions units are exempt from the requirements of OAC rule 3745-18-06 pursuant to OAC rule 3745-18-06(A).  See c)(7).
g.	OAC rule 3745-110-03(F)(2)	The emission limitation specified by this rule is less stringent than the limitation required per ORC 3704.03(T).
h.	40 CFR, Part 60, Subpart JJJJ 40 CFR 60.4233(e)	The NO <sub>x</sub> , CO and VOC emission limitations specified by this rule are less stringent than the limitations established by ORC 3704.03(T).  In accordance with 40 CFR 60.4230, these emissions units are subject to the New Source Performance Standards (NSPS) for Stationary SI ICE.  See b)(2)e and c)(8).

(2) Additional Terms and Conditions

- a. The engines shall be operated with a catalyst in place at all times.
- b. The emission limitations for PE are based on the uncontrolled potential to emit (PTE) for this emissions unit, therefore, no monitoring or record keeping is required to document compliance with the emission limitations.
- c. This Best Available Technology (BAT) emission limit applies until U.S. EPA approves Ohio Administrative Code (OAC) rule 3745-31-05(A)(3)(a)(ii) (the less than 10 tpy BAT exemption) into the Ohio State Implementation Plan (SIP).



- d. These requirements apply once U.S. EPA approves OAC rule 3745-31-05(A)(3)(a)(ii) (the less than 10 tpy BAT exemption) as part of the Ohio SIP:

The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE from this air contaminant source since the controlled potential to emit is less than 10 tons/year.

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

60.4236(b)	Installation deadlines
60.4243(b)(2)(ii)	Compliance demonstration, maintenance and testing frequency
60.4246, Table 3	Applicability of General Provisions

- f. The permittee must operate and maintain each emissions unit, including the air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions.

c) **Operational Restrictions**

- (1) The permittee shall install a continuous parameter monitoring system (CPMS) to continuously monitor the catalyst inlet temperature.
- (2) The CPMS must collect data at least once every 15 minutes.
- (3) The temperature sensor, for a CPMS measuring temperature range, must have a minimum tolerance of 5.0° F or 1.0% of the measurement range, whichever is larger.
- (4) Except during periods of startup, the permittee shall meet the following operational limitations:
  - a. the pressure drop across the oxidation catalyst shall not change by more than 2" of water at 100% load +/-10% from the pressure drop across the catalyst measured during the initial performance test; and
  - b. maintain the engine exhaust temperature so that the catalyst inlet temperature is greater than or equal to 450°F and less than or equal to 1,350°F.
- (5) If the catalyst is changed, the permittee must reestablish the values of the operating parameters measured during the initial performance test. When the operating parameter values are reestablished, the permittee must also conduct a performance test using one of the methods listed in 40 CFR, Part 63, Subpart ZZZZ, Table 4 to demonstrate that the engine is meeting the required emission limitation.
- (6) Each engine's time spent at idle during startup and the startup time must be minimized to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes.
- (7) The permittee shall burn only natural gas in this emissions unit.

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

60.4234	Duration of compliance with emission standards
60.4243(e)	Alternative fuel during emergency conditions
60.4243(g)	Air-to-fuel ratio controllers

- (9) The height of the stacks serving the engines listed below shall not be less than the following:

Emissions Unit	Engine ID	Engine Model	Stack Height
P003	COMP1	CAT G16CM34	72.70 ft.
P004	COMP2	CAT G16CM34	72.70 ft.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain records of any time period in which the engine(s) were operated without a catalyst installed.
- (2) If a fuel other than natural gas is burned in this emissions unit, the permittee shall maintain a record of the type and quantity of fuel burned.
- (3) The permittee shall develop a site-specific monitoring plan for the CPMS that contains the following elements:
  - a. the performance criteria and design specifications for the monitoring system equipment, including the sample interface, detector signal analyzer and data acquisition and calculations;
  - b. sampling interface location (e.g., thermocouple) such that the monitoring system will provide representative measurements;
  - c. equipment performance evaluations, system accuracy audits, or other audit procedures;
  - d. ongoing operation and maintenance procedures; and
  - e. ongoing reporting and record keeping procedures.
- (4) The CPMS shall be installed, operated and maintained continuously in accordance with the site-specific monitoring plan.
- (5) The permittee shall conduct the CPMS equipment performance evaluation, system accuracy audits, or other audit procedures specified in the site-specific monitoring plan at least annually.
- (6) The CPMS performance evaluation shall be conducted in accordance with the site-specific monitoring plan.



- (7) The permittee shall measure and record the pressure drop across the catalyst once per month.
- (8) The permittee shall comply with the applicable monitoring and record keeping requirements of 40 CFR, Part 60, Subpart JJJJ, including the following sections:

60.4245(a)(1)	Records of notifications and supporting documentation
60.4243(b)(2)(ii) and 60.4245(a)(2)	Maintenance plan and records of maintenance conducted on the engine

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify any deviations from the operational, monitoring or record keeping requirements listed in sections c) and d).

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

- (3) The permittee shall submit notifications and reports to the Ohio EPA, Northwest District Office as required pursuant to 40 CFR, Part 60, Subpart JJJJ, per the following sections:

60.4245(c)(1)-(5)	Initial notification
60.4245(d)	Copies of each performance test after completion

f) Testing Requirements

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

a. Emission Limitations:

Emissions of CH<sub>2</sub>O shall not exceed 14 ppmvd at 15% O<sub>2</sub> or emissions of CO shall be reduced by 93% or more.

Applicable Compliance Method:

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

b. Emission Limitations:

Emissions from the stack serving each emissions unit shall not exceed:

0.5 g/hp-hr of NO<sub>x</sub>



0.22 g/hp-hr of CO  
0.15 g/hp-hr of VOC

Applicable Compliance Method:

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

c. Emission Limitation:

PE from each engine shall not exceed 0.20 ton/month averaged over a 12-month rolling period.

Applicable Compliance Method:

These emissions are based on each engine's PTE and were calculated using the maximum engine rating and fuel consumption by the AP-42 emission factor listed in Table 3.2-2 (7/00).

$$H \times F \times C \times EF \times M \times (1 \text{ ton}/2,000 \text{ lbs}) = \text{ton/month}$$

where:

H = maximum engine horsepower rating: 8,180 hp;  
F = maximum fuel consumption: 6,660 Btu/hp-hr;  
C = conversion factor: 1 mmBtu/10<sup>6</sup> Btu;  
EF = emission factor for 4SLB natural gas engines: 0.0099871 lb/mmBtu; and  
M = maximum operating hours/month.

d. Opacity Limitation:

Visible PE from the exhaust stack serving each emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance with this emission limitation shall be demonstrated through visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR, Part 60, Appendix A, Method 9.

e. Emission Limitation:

PE shall not exceed 0.062 lb/mmBtu of actual heat input.

Applicable Compliance Method:

Compliance with this emission limitation may be based upon an emission factor of 0.0000771 lb/mmBtu of heat input. This emission factor is specified in the

U.S. EPA reference document AP-42, Compilation of Air Pollutant Emission Factors, Section 3.2, Table 3.2-2 (7/00).

If required, compliance with this emission limitation shall be demonstrated in accordance with the methods and procedures specified in 40 CFR, Part 60, Appendix A, Methods 1 through 5.

- (2) The permittee shall conduct, or have conducted, emission testing for these emissions units in accordance with the procedures specified in 40 CFR 60.4244(a) through (g), Table 2 to 40 CFR, Part 60, Subpart JJJJ and the following requirements:
- a. Conduct performance testing in the following manner:
    - i. The permittee shall conduct an initial performance test to demonstrate compliance with the mass emission limitations in 40 CFR 60.4233(e) for VOC, NO<sub>x</sub> and CO, within 1 year of startup and subsequent testing shall be conducted every 8,760 hours of engine operation or 3 years, whichever comes first, thereafter to demonstrate compliance.
    - ii. To demonstrate compliance with the formaldehyde emission limitation or reduction requirement for CO, the permittee shall conduct an initial performance test within 180 days of startup and every 6 months (semiannually); except, where following 2 consecutive compliant performance tests, the frequency can be reduced to annually if each such test demonstrates compliance with the CO reduction requirement or formaldehyde emission limitation and where there have been no deviations from operating limitations, to demonstrate compliance with either limit.
  - b. Each performance test conducted to determine compliance with 40 CFR, Part 60, Subpart JJJJ must be conducted within 10% of 100% peak (or the highest achievable) load and according to the requirements in 40 CFR 60.8 and under the specific conditions that are specified by Table 2 of Subpart JJJJ.
  - c. Each performance test conducted to determine compliance with ORC 3704.03(T) for either formaldehyde (CH<sub>2</sub>O) or a 93% reduction of emissions of CO shall be conducted according to the requirements in 40 CFR 63.6620 and under the conditions specified by Table 4 of Subpart ZZZZ.
  - d. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Northwest District Office (NWDO). 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, NWDO's refusal to accept the results of the emission test(s).
  - e. Personnel from the Ohio EPA, NWDO shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to



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

- f. A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, NWDO within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, NWDO.

g) Miscellaneous Requirements

- (1) None.

**6. Emissions Unit Group - 4,735 horsepower (hp) Stationary Spark Ignition (SI) Internal Combustion Engines (ICE): P005, P006**

EU ID	Operations, Property and/or Equipment Description
P005	4,735 hp CAT G3616 natural gas compressor controlled by an oxidation catalyst
P006	4,735 hp CAT G3616 natural gas compressor controlled by an oxidation catalyst

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC 3704.03(T)	<p>Emissions of formaldehyde (CH<sub>2</sub>O) shall not exceed 14 ppmvd at 15% O<sub>2</sub> or emissions of carbon monoxide (CO) shall be reduced by 93% or more.</p> <p>The permittee shall control the emissions of CH<sub>2</sub>O and CO from the stationary RICE exhaust using an oxidation catalyst control device.</p> <p>See c)(1).</p> <p>The requirements specified by this rule are equivalent to the requirements specified in 40 CFR, Part 63, Subpart ZZZZ.</p> <p>Emissions from the stack serving each emissions unit shall not exceed:</p> <p>0.5 g/hp-hr of nitrogen oxides (NO<sub>x</sub>)            0.19 g/hp-hr of CO            0.32 g/hp-hr of volatile organic compound (VOC)</p> <p>See b)(2)a.</p>

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-31-05(A)(3) June 30, 2008	Particulate emissions (PE) from each engine shall not exceed 0.13 ton/month averaged over a 12-month rolling period. See b)(2)b and b)(2)c.
c.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	See b)(2)d.
d.	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) from the exhaust stack serving each emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
e.	OAC rule 3745-17-11(B)	PE shall not exceed 0.062 lb/mmBtu of actual heat input.
f.	OAC rule 3745-18-06(G)	These emissions units are exempt from the requirements of OAC rule 3745-18-06 pursuant to OAC rule 3745-18-06(A).  See c)(7).
g.	OAC rule 3745-110-03(F)(2)	The emission limitation specified by this rule is less stringent than the emission limitation required per ORC 3704.03(T).
h.	40 CFR, Part 60, Subpart JJJJ 40 CFR 60.4233(e)	The NO <sub>x</sub> , CO and VOC emission limitations specified by this rule are less stringent than the emission limitations established by ORC 3704.03(T).  In accordance with 40 CFR 60.4230, these emissions units are subject to the New Source Performance Standards (NSPS) for Stationary SI ICE.  See b)(2)e, c)(8) and d)(8).

(2) Additional Terms and Conditions

- a. The engines shall be operated with a catalyst in place at all times.
- b. The emission limitations for PE are based on the uncontrolled potential to emit (PTE) for this emissions unit, therefore, no monitoring or record keeping is required to document compliance with the emission limitations.
- c. This Best Available Technology (BAT) emission limit applies until U.S. EPA approves Ohio Administrative Code (OAC) rule 3745-31-05(A)(3)(a)(ii) (the less than 10 tpy BAT exemption) into the Ohio State Implementation Plan (SIP).

- d. These requirements apply once U.S. EPA approves OAC rule 3745-31-05(A)(3)(a)(ii) (the less than 10 tpy BAT exemption) as part of the Ohio SIP:

The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE from this air contaminant source since the controlled potential to emit is less than 10 tons/year.

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

60.4236(b)	Installation deadlines
60.4243(b)(2)(ii)	Compliance demonstration, maintenance and testing frequency
60.4246, Table 3	Applicability of General Provisions

- f. The permittee must operate and maintain each emissions unit, including the air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions.

c) **Operational Restrictions**

- (1) The permittee shall install a continuous parameter monitoring system (CPMS) to continuously monitor the catalyst inlet temperature
- (2) The CPMS must collect data at least once every 15 minutes.
- (3) The temperature sensor, for a CPMS measuring temperature range, must have a minimum tolerance of 5.0° F or 1.0% of the measurement range, whichever is larger.
- (4) Except during periods of startup, the permittee shall meet the following operational limitations:
  - a. the pressure drop across the oxidation catalyst shall not change by more than 2" of water at 100% load +/-10% from the pressure drop across the catalyst measured during the initial performance test; and
  - b. maintain the engine exhaust temperature so that the catalyst inlet temperature is greater than or equal to 450°F and less than or equal to 1350°F.
- (5) If the catalyst is changed, the permittee must reestablish the values of the operating parameters measured during the initial performance test. When the operating parameter values are reestablished, the permittee must also conduct a performance test using one of the methods listed in 40 CFR, Part 63, Subpart ZZZZ, Table 4 to demonstrate that the engine is meeting the required emission limitation.
- (6) Each engine's time spent at idle during startup and the startup time must be minimized to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes.
- (7) The permittee shall burn only natural gas in this emissions unit.

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

60.4234	Duration of compliance with emission standards
60.4243(e)	Alternative fuel during emergency conditions
60.4243(g)	Air-to-fuel ratio controllers

- (9) The height of the stacks serving the engines listed below shall not be less than the following:

Emissions Unit	Engine ID	Engine Model	Stack Height
P005	COMP3	CAT G3616	56.5 ft.
P006	COMP4	CAT G3616	56.5 ft.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain records of any time period in which the engine(s) were operated without a catalyst installed.
- (2) If a fuel other than natural gas is burned in this emissions unit, the permittee shall maintain a record of the type and quantity of fuel burned.
- (3) The permittee shall develop a site-specific monitoring plan for the CPMS that contains the following elements:
  - a. the performance criteria and design specifications for the monitoring system equipment, including the sample interface, detector signal analyzer and data acquisition and calculations;
  - b. sampling interface location (e.g., thermocouple) such that the monitoring system will provide representative measurements;
  - c. equipment performance evaluations, system accuracy audits, or other audit procedures;
  - d. ongoing operation and maintenance procedures; and
  - e. ongoing reporting and record keeping procedures.
- (4) The CPMS shall be installed, operated and maintained continuously in accordance with the site-specific monitoring plan.
- (5) The permittee shall conduct the CPMS equipment performance evaluation, system accuracy audits, or other audit procedures specified in the site-specific monitoring plan at least annually.
- (6) The CPMS performance evaluation shall be conducted in accordance with the site-specific monitoring plan.

- (7) The permittee shall measure and record the pressure drop across the catalyst once per month.
- (8) The permittee shall comply with the applicable monitoring and record keeping requirements of 40 CFR, Part 60, Subpart JJJJ, including the following sections:

60.4245(a)(1)	Records of notifications and supporting documentation
60.4243(b)(2)(ii) and 60.4245(a)(2)	Maintenance plan and records of maintenance conducted on the engine

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify any deviations from the operational, monitoring or record keeping requirements listed in sections c) and d).

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

- (3) The permittee shall submit notifications and reports to the Ohio EPA, Northwest District Office as required pursuant to 40 CFR, Part 60, Subpart JJJJ, per the following sections:

60.4245(c)(1)-(5)	Initial notification
60.4245(d)	Copies of each performance test after completion

f) Testing Requirements

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

a. Emission Limitations:

Emissions of CH<sub>2</sub>O shall not exceed 14 ppmvd at 15% O<sub>2</sub> or emissions of CO shall be reduced by 93% or more.

Applicable Compliance Method:

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

b. Emission Limitations:

Emissions from the stack serving each emissions unit shall not exceed:

0.5 g/hp-hr of NO<sub>x</sub>



0.19 g/hp-hr of CO  
0.32 g/hp-hr of VOC

Applicable Compliance Method:

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

c. Emission Limitation:

PE from each engine shall not exceed 0.13 ton/month averaged over a 12-month rolling period.

Applicable Compliance Method:

These emissions are based on each engine's PTE and were calculated using the maximum engine rating and fuel consumption by the AP-42 emission factor listed in Table 3.2-2 (7/00).

$$H \times F \times C \times EF \times M \times (1 \text{ ton}/2,000 \text{ lbs}) = \text{ton/month}$$

where:

H = maximum engine horsepower rating: 4,735 hp;  
F = maximum fuel consumption: 7,491 Btu/hp-hr;  
C = conversion factor: 1 mmBtu/10<sup>6</sup> Btu;  
EF = emission factor for 4SLB natural gas engines: 0.0099871 lb/mmBtu; and  
M = maximum operating hours/month.

d. Opacity Limitation:

Visible PE from the exhaust stack serving each emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance with this emission limitation shall be demonstrated through visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

e. Emission Limitation:

PE shall not exceed 0.062 lb/mmBtu of actual heat input.

Applicable Compliance Method:

Compliance with this emission limitation may be based upon an emission factor of 0.0000771 lb/mmBtu of heat input. This emission factor is specified in the U.S. EPA reference document AP-42, Compilation of Air Pollutant Emission Factors, Section 3.2, Table 3.2-2 (7/00).

If required, compliance with this emission limitation shall be demonstrated in accordance with the methods and procedures specified in 40 CFR, Part 60, Appendix A, Methods 1 through 5.

- (2) The permittee shall conduct, or have conducted, emission testing for these emissions units in accordance with the procedures specified in 40 CFR 60.4244(a)-(g), Table 2 to Subpart JJJJ and the following requirements:
- a. Conduct performance testing in the following manner:
    - i. The permittee shall conduct an initial performance test to demonstrate compliance with the mass emission limitations in 40 CFR 60.4233(e) for VOC, NO<sub>x</sub> and CO, within 1 year of startup and subsequent testing shall be conducted every 8,760 hours of engine operation or 3 years, whichever comes first, thereafter to demonstrate compliance.
    - ii. To demonstrate compliance with the formaldehyde emission limitation or reduction requirement for CO, the permittee shall conduct an initial performance test within 180 days of startup and every 6 months (semiannually); except, where following 2 consecutive compliant performance tests, the frequency can be reduced to annually if each such test demonstrates compliance with the CO reduction requirement or formaldehyde emission limitation and where there have been no deviations from operating limitations, to demonstrate compliance with either limit.
  - b. Each performance test conducted to determine compliance with 40 CFR, Part 60, Subpart JJJJ must be conducted within 10% of 100% peak (or the highest achievable) load and according to the requirements in 40 CFR 60.8 and under the specific conditions that are specified by Table 2 of Subpart JJJJ.
  - c. Each performance test conducted to determine compliance with ORC 3704.03(T) for either formaldehyde (CH<sub>2</sub>O) or a 93% reduction of emissions of CO shall be conducted according to the requirements in 40 CFR 63.6620 and under the conditions specified by Table 4 of Subpart ZZZZ.
  - d. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Northwest District Office (NWDO). 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, NWDO's refusal to accept the results of the emission test(s).
  - e. Personnel from the Ohio EPA, NWDO shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.



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

g) Miscellaneous Requirements

(1) None.

**7. Emissions Unit Group - Truck Loading: J001, J002**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
J001	Truck load-out from slop tank
J002	Truck load-out from waste-water tank

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	<b>Applicable Rules/Requirements</b>	<b>Applicable Emissions Limitations/Control Measures</b>
a.	OAC rule 3745-31-05(A)(3) June 30, 2008	Fugitive volatile organic compound (VOC) emissions shall not exceed 0.0002 ton/month, averaged over a 12-month rolling period.  See b)(2)a.
b.	OAC rule 3745-31-03(A)(3)(a)(ii) June 30, 2008	See b)(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) rule 3745-31-05(A)(3)(a)(ii) (the less than 10 tpy BAT exemption) into the Ohio State Implementation Plan (SIP).

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

The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the uncontrolled potential to emit is less than 10 tons/year.

c. All truck loading lines shall be equipped with fittings which are vapor tight.

d. The hatches on the vehicle being loaded shall be closed at all times during the loading of the vessel.

- e. The permittee shall not permit slop to be spilled, discarded in sewers, stored in open containers or handled in any other manner that would result in evaporation.
- c) Operational Restrictions
  - (1) Prior to connecting the transfer line(s) from the tank to the 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.
  - (2) During the loading from the tank to the tank truck, the permittee shall continually monitor the transfer equipment, the tank and the tank truck for any leaks through visual, olfactory, or other observations. If any leak is detected, loading shall cease until the leaking component has been repaired.
- d) Monitoring and/or Recordkeeping Requirements
  - (1) The permittee shall collect and record the following each month:
    - a. the amount of throughput from each slop/wastewater tank, in gallons; and
    - b. the monthly VOC emissions as calculated in section f)(1)a, in tons.
- e) Reporting Requirements
  - (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
  - (2) The permittee shall submit an annual report identifying the total throughput from each slop/wastewater tank, in gallons.
  - (3) If, after the first two years of operation, the annual reports demonstrate that the throughput has not led to an exceedance of the annual VOC emission limitation, the permittee may, upon receipt of written approval from the Ohio EPA Northwest District Office, discontinue this reporting requirement.
- 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 0.0002 ton/month, averaged over a 12-month rolling period.



Applicable Compliance Method:

VOC emissions from each loading operation shall be determined by multiplying the loading loss factor (L) by the rolling, 12-month summation of the throughput, in gallons, by the conversion (1 ton/2,000 pounds). The loading loss factor was derived using Equation (1) from AP-42, Section 5.2.2.1.1, Equation 1 (6/08).

$$L = 12.46 \text{ SMP/T}$$

where:

L = loading loss, lb/10<sup>3</sup> gal of liquid loaded;

S = saturation factor, 0.6 for submerged fill;

M = molecular weight of vapor, lb/lb-mole: (slop 21.93), (wastewater 21.78);

P = true vapor pressure of liquid loaded, 0.20 average psia; and

T = temperature of bulk liquid, = 510.84 Rankine (average 51.17°F).

g) Miscellaneous Requirements

- (1) None.