



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

10/24/2016

Kristin Budden
 Goliath Compressor Station
 400 Woodcliffe Drive
 Canonsburg, PA 15202

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL
 Facility ID: 0656025012
 Permit Number: P0120257
 Permit Type: Initial Installation
 County: Monroe

Certified Mail

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

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

How to give us feedback on your permitting experience

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

How to get an electronic copy of your permit

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

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

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

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

Sincerely,



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

Cc: U.S. EPA
Ohio EPA-SEDO; Pennsylvania; West Virginia



FINAL

**Division of Air Pollution Control
Permit-to-Install
for
Goliath Compressor Station**

Facility ID:	0656025012
Permit Number:	P0120257
Permit Type:	Initial Installation
Issued:	10/24/2016
Effective:	10/24/2016



Division of Air Pollution Control
Permit-to-Install
for
Goliath Compressor Station

Table of Contents

Authorization	1
A. Standard Terms and Conditions	4
1. Federally Enforceable Standard Terms and Conditions	5
2. Severability Clause	5
3. General Requirements	5
4. Monitoring and Related Record Keeping and Reporting Requirements.....	6
5. Scheduled Maintenance/Malfunction Reporting	7
6. Compliance Requirements	7
7. Best Available Technology	8
8. Air Pollution Nuisance	8
9. Reporting Requirements	9
10. Applicability	9
11. Construction of New Sources(s) and Authorization to Install	9
12. Permit-To-Operate Application	10
13. Construction Compliance Certification	10
14. Public Disclosure	11
15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations	11
16. Fees.....	11
17. Permit Transfers	11
18. Risk Management Plans	11
19. Title IV Provisions	11
B. Facility-Wide Terms and Conditions.....	12
C. Emissions Unit Terms and Conditions	14
1. Emissions Unit Group -Caterpillar G3608 A4 2500 HP Engines: P011-P021	15



Final Permit-to-Install
Goliath Compressor Station
Permit Number: P0120257
Facility ID: 0656025012
Effective Date: 10/24/2016

Authorization

Facility ID: 0656025012
Facility Description:
Application Number(s): A0055229, A0056683
Permit Number: P0120257
Permit Description: Initial installation of 11 Caterpillar 2500 HP compression engines
Permit Type: Initial Installation
Permit Fee: \$2,200.00
Issue Date: 10/24/2016
Effective Date: 10/24/2016

This document constitutes issuance to:

Goliath Compressor Station
48208 St Rte 556
Beallsville, OH 43716

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

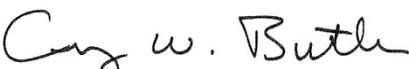
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

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

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: P0120257

Permit Description: Initial installation of 11 Caterpillar 2500 HP compression engines

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

Group Name: Caterpillar G3608 Engines

Emissions Unit ID:	P011
Company Equipment ID:	Compressor #9
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P012
Company Equipment ID:	Compressor #10
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P013
Company Equipment ID:	Compressor #11
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P014
Company Equipment ID:	Compressor #12
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P015
Company Equipment ID:	Compressor #13
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P016
Company Equipment ID:	Compressor #14
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P017
Company Equipment ID:	Compressor #15
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P018
Company Equipment ID:	Compressor #16
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P019
Company Equipment ID:	Compressor #17
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P020
Company Equipment ID:	Compressor #18
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



Final Permit-to-Install
Goliath Compressor Station
Permit Number: P0120257
Facility ID: 0656025012
Effective Date: 10/24/2016

Emissions Unit ID:	P021
Company Equipment ID:	Compressor #19
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



Final Permit-to-Install
Goliath Compressor Station
Permit Number: P0120257
Facility ID: 0656025012
Effective Date: 10/24/2016

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, Southeast 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, Southeast 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, Southeast 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, Southeast 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, Southeast 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, Southeast 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, Southeast 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
Goliath Compressor Station
Permit Number: P0120257
Facility ID: 0656025012
Effective Date: 10/24/2016

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. This facility is subject to the requirements of 40 CFR Part 63 Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Reciprocating Internal Combustion Engines. Although Ohio EPA has determined that this Generally Available Control Technology (GACT) NESHAP applies, at this time Ohio EPA does not have 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: <https://www.epa.gov/technical-air-pollution-resources>.
3. This facility is subject to 40 CFR Part 60, Subpart JJJJ. The complete NSPS requirements, including the NSPS General Provisions, may be accessed via the internet from the e-CFR website <http://www.ecfr.gov> or by contacting the appropriate Ohio EPA District office of local air agency.
4. The facility is subject to 40 CFR Part 60, Subpart OOOOa. The complete NSPS requirements, including the NSPS General Provisions, may be accessed via the internet from the e-CFR website <http://www.ecfr.gov> or by contacting the appropriate Ohio EPA District office of local air agency.



Final Permit-to-Install
Goliath Compressor Station
Permit Number: P0120257
Facility ID: 0656025012
Effective Date: 10/24/2016

C. Emissions Unit Terms and Conditions

1. Emissions Unit Group -Caterpillar G3608 A4 2500 HP Engines: P011-P021

EU ID	Operations, Property and/or Equipment Description
P011	Compressor #9 - driven by Caterpillar natural gas fired 2500 HP A4 engine
P012	Compressor #10 - driven by Caterpillar natural gas fired 2500 HP A4 engine
P013	Compressor #11 - driven by Caterpillar natural gas fired 2500 HP A4 engine
P014	Compressor #12 - driven by Caterpillar natural gas fired 2500 HP A4 engine
P015	Compressor #13 - driven by Caterpillar natural gas fired 2500 HP A4 engine
P016	Compressor #14 - driven by Caterpillar natural gas fired 2500 HP A4 engine
P017	Compressor #15 - driven by Caterpillar natural gas fired 2500 HP A4 engine
P018	Compressor #16 - driven by Caterpillar natural gas fired 2500 HP A4 engine
P019	Compressor #17 - driven by Caterpillar natural gas fired 2500 HP A4 engine
P020	Compressor #18 - driven by Caterpillar natural gas fired 2500 HP A4 engine
P021	Compressor #19 - driven by Caterpillar natural gas fired 2500 HP A4 engine

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) See b(1)c. and b(2)b. below.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 6/30/2008	Install an engine designed with an air-to-fuel ratio controller designed to meet an emission limitation of 0.3 g Nitrogen Oxide (NOx)/bhp-hr. Install an engine designed to meet 0.20 g Carbon Monoxide (CO)/ bhp-hr Install an engine designed to meet 0.06 g Volatile Organic Compounds (VOC)/bhp-hr Install an engine designed to meet 5.88E-4 lb sulfur dioxide (SO2)/million British thermal units (mmBtu). Install an engine designed to meet 7.71E-5 lb particulate matter less than 10

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>microns in size (PM10)/mmBtu.</p> <p>See b)(2)a. below.</p>
c.	<p>OAC rule 3745-31-05(A)(3)(a)(ii), as effective June 30, 2008</p>	<p>The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the NO_x, VOC SO₂ and PM10 emissions from this air contaminant source since the potential to emit is less than 10 tons per year.</p> <p>The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the CO emissions from this air contaminant source since the potential to emit is less than 10 tons per year taking into account the voluntary restriction from OAC rule 3745-31-05(E).</p> <p>See b)(2)b. below.</p>
d.	<p>OAC rule 3745-31-05(E), as effective June 30, 2008</p>	<p>Emissions shall not exceed 4.65 tons of CO per year.</p> <p>Install and operate each engine with an oxidation catalyst designed to meet 0.20 g CO/bhp-hr.</p>
e.	<p>40 CFR Part 60, Subpart OOOOa (40 CFR 60.5360a – 5499a) [In accordance with 40 CFR 60.5365a(c), this emissions unit is a reciprocating compressor subject to the Standards of Performance for Crude oil and Natural Gas Production, Transmission, and Distribution which commenced operation which commenced construction or was modified after September 18, 2015]</p>	<p>See b)(2)c. below.</p>
f.	<p>40 CFR, Part 60, Subpart JJJJ (40 CFR 60.4230-4248) [40 CFR 60.4232(e)]</p> <p>In accordance with 40 CFR 60.4230, this emissions unit is subject to the New Source Performance Standards (NSPS) for Stationary Spark Ignition</p>	<p>The exhaust emissions from this engine shall not exceed:</p> <p>1.0 g NO_x/hp-hr or 82 ppmvd at 15% O₂</p> <p>2.0 g CO/hp-hr or 270 ppmvd at 15% O₂</p>

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	(SI) Internal Combustion Engines (ICE). This emissions unit is a non-emergency, stationary, spark ignition, lean burn, internal combustion engine greater than 500 HP manufactured after July 1, 2010.	0.7 g VOC/hp-hr or 60 ppmvd at 15% O ₂ Table 1 to 40 CFR, Part 60, Subpart JJJJ
g.	40 CFR, Part 60, Subpart A (40 CFR 60.1-19) [40 CFR 60.4246]	Table 3 to Subpart JJJJ of 40 CFR Part 60 – Applicability of General Provisions to Subpart JJJJ shows which parts of the General Provisions in 40 CFR 60. 1-19 apply.
h.	40 CFR, Part 60, Subpart A (40 CFR 60.1-19) [40 CFR 60.4246]	Table 3 to Subpart OOOOa of 40 CFR Part 60- Applicability of General Provisions to Subpart OOOOa shows which parts of the General Provision in 40 CFR 60. 1-19 apply.
i.	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
j.	OAC rule 3745-17-11(B)(5)(b)	PE shall not exceed 0.062 lb/mmBtu of actual heat input.

(2) Additional Terms and Conditions

- a. This Best Available Technology (BAT) emissions limit applies until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP). (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).
- b. These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.
- c. The permittee Shall comply with the additional requirements required under 40 CFR Part 60, Subpart OOOOa, including the following sections:

60.5370a(a)	Compliance deadline
60.5370a(b)	Maintain and operate equipment in manner consistent with good air pollution control practice for minimizing emissions.
60.5370a(c)	Exemption from obligation to obtain a Title V permit.
60.5398a(a)-(f)	Alternative means requirements

c) Operational Restrictions

- (1) The permittee shall burn only natural gas in these emissions units.
- (2) In order to meet the emission limitations specified in b)(1)a., and b)(1)d. the permittee shall install and operate the engines with nonselective catalytic reduction for the control of CO and VOC emissions and the operation of air-to-fuel ratio controls for NOx whenever this emissions unit is in operation and shall maintain the engines in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee. The oxidation catalyst must contain five elements to meet the design standard that was provided in the permittees application to achieve 93% reduction of CO, 80% reduction of VOC, and 85% reduction of formaldehyde. If a modification is deemed necessary by the permittee, Ohio EPA must be notified within 30 days after the modification and all emission limitations in C.1.b)(1) still apply.

- (3) The permittee shall comply with the applicable requirements required under 40 CFR, Part 60, Subpart JJJJ, including the following sections:

60.4234	Duration of compliance with emissions standards
60.4243(e)	Alternative fuel during emergency conditions
60.4243(g)	Operation and maintenance of air-to-fuel ratio controllers.

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

60.5385a(a)		Replace the reciprocating compressor rod packing according to either paragraph (a)(1) or (a)(2) of this section, or you must comply with paragraph (a)(3) of this section.
-------------	--	--

- (5) In the event the engine is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the engine shall be expeditiously repaired or otherwise returned to these documented operating conditions.

d) Monitoring and/or Recordkeeping Requirements

- (1) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
- (2) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, operating manuals for the engines, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
- (3) The permittee shall conduct periodic inspections of the engine to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. If modifications are deemed necessary by the permittee, Ohio EPA must be notified within 30 days from the time the modification is deemed necessary. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency, and it shall be made available to the Ohio EPA upon request.
- (4) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the engine while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (5) The permittee shall document each inspection (periodic and annual) of the engine and shall maintain the following information:
 - a. The date of the inspection;
 - b. A description of each/any problem identified and the date it was corrected;
 - c. A description of any maintenance and repairs performed; and

d. The name of the person who performed the inspection.

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

- (6) The permittee shall maintain records that document any time periods when the nonselective catalytic reduction was not in service when the emissions unit(s) was/were in operation, as well as a record of all operations during which the engine was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.
- (7) The permittee shall comply with the applicable restrictions of 40 CFR Part 60, Subpart JJJJ, including the following sections:

60.4243(b)(2)(ii) and 60.4245	Maintain records of maintenance plan and records of maintenance conducted on the engine
-------------------------------	---

- (8) The permittee shall comply with the applicable monitoring and recordkeeping of 40 CFR Part 60, Subpart OOOOa, including the following sections:

60.5385a(b)	Initial compliance must be demonstrated with standards that apply to reciprocating compressor facilities as required by 60.5410a(c)
60.5385a(c)	Continuous compliance must be demonstrated with standards that apply to reciprocating compressor affected facilities a required by 60.5415a(c)
60.5385a(d)	Record keeping must be performed as required by 60.5240(a)(c)(3), (6) through (9) and (17) as applicable.

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit or if the emissions unit is operated without the established number of catalyst elements to achieve the reduction efficiency's as provided in the permittees application (A0056683). Each report shall be submitted within 30 days after the deviation occurs.

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

60.4245(a)	Maintain records of notifications and supporting documentation
60.4245(c)	Must submit an initial notification
60.4245(d)	Performance testing

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

60.5385a(d)	Reporting requirements must be performed as required by 60.5420a(b)(1) and (4).
-------------	---

f) Testing Requirements

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

a. Emissions Limitation:

Install an engine with an air-to-fuel ration controller designed to meet an emissions limitation of 0.3 grams (g) nitrogen oxides NOx/bhp-hr.

Applicable Compliance Method:

The gr/hp-hr emission limitation was established based on the manufacturer emission factor provided by the permittee in permit application #A0056683.

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 and 7 of 40 CFR, Part 60, Appendix A.

b. Emissions Limitation:

Install an engine designed to meet 0.20 g CO/bhp-hr

Applicable Compliance Method:

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

c. Emissions Limitation:

Install an engine designed to meet 0.06 g VOC/bhp-hr

Applicable Compliance Method:

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

d. Emissions Limitation:

CO emissions shall not exceed 4.65 tons per year

Applicable Compliance Method:

$$\frac{2.75 \text{ g}}{\text{bhp} - \text{hr}} (1 - .93) * 2500 \text{ bhp} * \frac{8,760 \text{ hr}}{\text{yr}} * \frac{\text{ton}}{2,000 \text{ lb}} * \frac{1 \text{ lb}}{453.59} = 4.65 \text{TPY}$$

Compliance with the TPY shall allowable is assumed if compliance with the 0.20 g/bhp-hr is demonstrated.

e. Emissions Limitation:

Install an engine that is designed to meet 5.88E-4 lb SO2/mmBtu.

Applicable Compliance Method:

The lb/mmBtu emission limitation was established based on the manufactures specification provided by the permittee in permit application #A0056683.

If required, the permittee shall demonstrate compliance by testing in accordance with Method 1-4 and 6 of 40 CFR, Part 60, Appendix A.

f. Emissions Limitation:

Install an engine that is designed to meet 7.71E-5 lb PM10/mmBtu.

Applicable Compliance Method:

The lb/mmBtu emission limitation was established based on the manufactures specification provided by the permittee in permit application #A0056683.

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 of 40 CFR, Part 60, Appendix A and Methods 201/201A and 202 of 40 CFR, Part 51, Appendix M.

g. Emissions Limitation:

1.0 g NOx/hp-hr or 82 ppmvd at 15% O₂

Applicable Compliance Method:

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

- h. Emissions Limitation:

2.0 g CO/hp-hr or 270 ppmvd at 15% O₂

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emissions testing requirements specified in f)(2).
 - i. Emissions Limitation

0.7 g VOC/HP-hr or 60 ppmvd at 15% O₂

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emissions testing requirements specified in f)(2).
 - j. Emissions Limitation:

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

Applicable Compliance Method:

The PE limitation is from OAC rule 3745-17-11(B)(5) for stationary internal combustion engines.

If required, particulate emissions shall be determined according to test methods 1-5, as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources" Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.
- (2) When purchasing a non-certified engine, the permittee shall demonstrate compliance with the emission standards specified in 40 CFR 60.4233(e) and according to the requirements specified in 40 CFR 60.4244, as applicable. The permittee must keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practices for minimizing emissions.
- a. The permittee has chosen to demonstrate compliance with the emission standards specified in §60.4233(e) and OAC rule 3745-31-05(A)(3) by performing a stack test, and therefore the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the procedures specified in 40 CFR 60.4244; 40 CFR Part 60, Subpart JJJJ Table 2; and the following requirements:
 - i. An initial performance test shall be performed to demonstrate compliance with the mass emissions limitations and design efficiencies in f)(1)a.-d & g.-i.. of this permit within 60 days after achieving the maximum production

rate at which the emissions unit will be operated, but not later than 180 days after initial startup of the emissions unit.

- ii. If the stationary internal combustion engine is rebuilt, or undergoes major repair or maintenance the permittee shall conduct subsequent performance test.
 - iii. Each performance test 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 40 CFR Part 60, Subpart JJJJ.
 - iv. 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, Southeast District Office. 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, Southeast District Office's refusal to accept the results of the emission test(s).
 - v. Personnel from the Ohio EPA, Southeast District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the 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.
 - vi. 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, Southeast District Office 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, Southeast District Office.
- g) Miscellaneous Requirements
- (1) None.