



State of Ohio Environmental Protection Agency

STREET ADDRESS:

Lazarus Government Center
50 W. Town St., Suite 700
Columbus, Ohio 43215

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P.O. Box 1049
Columbus, OH 43216-1049

9/3/2008

Certified Mail

Mr. Sam Mathews
Dominican East Ohio Gas - Pike Compresso
1201 East 55th St.
Cleveland, OH 44103

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR
No	CEMS
No	MACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1576002033
Permit Number: P0103794
Permit Type: Renewal
County: Stark

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, The Canton Repository. A copy of the public notice and the draft permit are enclosed. This permit has been posted to the Division of Air Pollution Control Web page <http://www.epa.state.oh.us/dapc> in Microsoft Word and Adobe Acrobat format. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
Columbus, Ohio 43215

and Canton City Health Department
420 Market Avenue
Canton, OH 44702-1544

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install and operate will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install and Operate is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Canton City Health Department at (330)489-3385.

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
Canton; Pennsylvania; West Virginia

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

**FEPTIO STRATEGY FOR LIMITING TOTAL HAPs PTE
FOR A
ONE MILLION BTU/HR. DEHYDRATOR LOCATED AT
DOMINION EAST OHIO PIKE TWP. COMPRESSOR STATION**

**PREMISE NO. 15 76 00 2033
FEPTIO P0103794**

A. Source Description

Natural Gas Dehydrator which uses a Glycol based dessicant for drying natural gas. The emissions unit is rated at 1 mmBTU/hr. and operates in Pike Twp., Ohio. Liquid dessicant (typically triethylene glycol) is used to remove water vapor from ng. the dessicant is brought into contact with "wet" ng in the contactor. The dense wetted dessicant sinks to the bottom of the contactor and is removed from the contactor. the dried ng flows out of the dehydrator. the wetted dessicant is heated in the 1 MMBtu/hr. boiler to evaporate the water from the dessicant. the dried dessicant returns to the contactor to be reused. Prior to the boiler, a flash tank separator-condensor reduces the pressure of the wetted dessicant to vaporize the small amounts of methane and other hydrocarbons in the wetted dessicant stream. Emissions from the boiler and flash tank are treated in a thermal oxidizer prior to release to the atmosphere.

B. Facility Emissions and Attainment Status

The facility is a new compressor station in an attainment area for all criteria pollutants. The facility emissions are for criteria pollutants are under 10 tpy except for NOx and CO from the two compressor engines. The source includes 2 reciprocating compressors and the dehydrator unit.

C. Source Emissions

Uncontrolled HAP PTE emission rates exceed the MACT threshold values of 10 tpy and 25 tpy. The source uncontrolled PTE emissions are under 10 tpy for NOx, CO, PE, and SO2. VOC and HAPs are controlled with a thermal oxidizer to restrict the PTE for total HAPs under MACT thresholds and to restrict the PTE for VOC under 10 tpy.

D. Conclusion

The company has chosen to use a thermal oxidizer to reduce the HAP PTE to under threshold limits using federally enforceable restrictions.

VOC and HAP emissions were calculated using a computer program known as GRI-GLYCALC. This program is used to calculate these emission rates from dehydrator systems. Based on these calculations, it seems that the uncontrolled PTE emissions for total HAP, the largest single HAP emitted, and VOC emissions are 36.4 tpy, 17.1 tpy, and 92.1 tpy, respectively. The HAP values most certainly exceed MACT thresholds. The company has chosen to utilize a thermal oxidizer for reducing the HAP and VOC emissions to below MACT and BAT thresholds respectively. The HAP emissions will be reduced to below the major source threshold of 25 tpy total HAP and the single HAP threshold of 10 tpy. When this occurs, all criteria pollutant emissions will be less than 10 tpy. The control device will have federally enforceable restrictions and MRR requirements. The allowables for VOC and total HAP allowable were set 20 % higher than the VOC calculations indicated to allow for a buffer. HAP and VOC allowables are = $1.2 \times 1.84 \text{ tpy} = 2.2 \text{ tpy}$.

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install and Operate
Dominican East Ohio Gas - Pike Compresso

Issue Date: 9/3/2008

Permit Number: P0103794

Permit Type: Renewal

Permit Description: This FEPTIO is being issued for the installation of a natural gas dehydrator at Dominion EO Pike Twp. compressor station. The FEPTIO will contain federally enforceable restrictions to restrict the emissions unit's total HAP emissions to below MACT thresholds.

Facility ID: 1576002033

Facility Location: Dominican East Ohio Gas - Pike Compresso
6024 Kieffer Ave., SW,
Pike Twp., Ohio, OH 44706

Facility Description: Natural Gas Distribution

Chris Korleski, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio has issued a draft action of an air pollution control, federally enforceable permit-to-install and operate (PTIO) for the facility at the location identified above on the date indicated. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Denny Tan at Canton City Health Department, 420 Market Avenue or (330)489-3385 . The permit can be downloaded from the Web page: www.epa.state.oh.us/dapc



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

DRAFT

Air Pollution Permit-to-Install and Operate
for
Dominican East Ohio Gas - Pike Compresso

Facility ID: 1576002033
Permit Number: P0103794
Permit Type: Renewal
Issued: 9/3/2008
Effective: To be entered upon final issuance
Expiration: To be entered upon final issuance



Air Pollution Permit-to-Install and Operate
for
Dominican East Ohio Gas - Pike Compresso

Table of Contents

Authorization 1

A. Standard Terms and Conditions 3

 1. What does this permit-to-install and operate ("PTIO") allow me to do?..... 4

 2. Who is responsible for complying with this permit? 4

 3. What records must I keep under this permit? 4

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

 5. When does my PTIO expire, and when do I need to submit my renewal application? 4

 6. What happens to this permit if my project is delayed or I do not install or modify my source? 5

 7. What reports must I submit under this permit? 5

 8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit? 5

 9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?... 5

 10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report? 6

 11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located? 6

 12. What happens if one or more emissions units operated under this permit is/are shut down permanently? 6

 13. Can I transfer this permit to a new owner or operator? 6

 14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"? 7

 15. What happens if a portion of this permit is determined to be invalid? 7

B. Facility-Wide Terms and Conditions 8

C. Emissions Unit Terms and Conditions 10

 1. P003 11



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0103794

Facility ID: 1576002033

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 1576002033

Application Number(s): A0035816

Permit Number: P0103794

Permit Description: This FEPTIO is being issued for the installation of a natural gas dehydrator at Dominion EO Pike Twp. compressor station. The FEPTIO will contain federally enforceable restrictions to restrict the emissions unit's total HAP emissions to below MACT thresholds.

Permit Type: Renewal

Permit Fee: \$0.00 *DO NOT send payment at this time - subject to change before final issuance*

Issue Date: 9/3/2008

Effective Date: To be entered upon final issuance

Expiration Date: To be entered upon final issuance

Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

Dominican East Ohio Gas - Pike Compresso
6024 Kieffer Ave., SW
Pike Twp., Ohio, OH 44706

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

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Canton City Health Department
420 Market Avenue
Canton, OH 44702-1544
(330)489-3385

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0103794

Facility ID: 1576002033

Effective Date: To be entered upon final issuance

Authorization (continued)

Permit Number: P0103794

Permit Description: This FEPTIO is being issued for the installation of a natural gas dehydrator at Dominion EO Pike Twp. compressor station. The FEPTIO will contain federally enforceable restrictions to restrict the emissions unit's total HAP emissions to below MACT thresholds.

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

Emissions Unit ID:	P003
Company Equipment ID:	P003
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0103794

Facility ID: 1576002033

Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions



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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

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



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

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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

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

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



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0103794

Facility ID: 1576002033

Effective Date: To be entered upon final issuance

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

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

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

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



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0103794

Facility ID: 1576002033

Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.
2. Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

[OAC rule 3745-15-03(B)(2)] and [OAC rule 3745-15-03(D)]



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0103794

Facility ID: 1576002033

Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. P003

Operations, Property and/or Equipment Description:

One mmBtu/hr. natural gas dehydration system to be located at the Pike Twp., Ohio gas compressor station.

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(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. 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)(a)(ii)	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the NOx, SOx, PM, PM-10, or CO emissions from this air contaminant source since the uncontrolled potential to emit for these pollutants is less than ten tons per year
b.	OAC rule 3745-31-05(D)	0.5 lb total HAPs/hour 2.2 tpy total HAPs as a rolling, 12 month summation. See C.1.f.
c.	OAC rule 3745-31-05(D)	FEPTIO P0103794 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		Thermal oxidizer Synthetic Minor Restriction of PTE for HAP's using thermal oxidizer. The use of the thermal oxidizer to restrict the PTE of the HAPS also restricts the PTE for VOC to under 10 tpy 2.20 tpy VOC See C.1.b.(2).a
d.	OAC rule 3745-17-10(B)(1)	0.02 lb PE/mmBtu
f.	OAC rule 3745-17-07(A)(1)	Visible Particulate Emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

(2) Additional Terms and Conditions

a. The uncontrolled HAP emissions from this emissions unit exceed the 10 tpy and 25 tpy threshold limits specified under 40 CFR Part 63. The permittee has chosen to restrict their PTE below these threshold values by using a thermal oxidizer and federally enforceable restrictions on HAP emissions to keep this emissions unit from being subject to MACT standards. The synthetic minor restrictions specified above also restricts VOC emissions below the BAT exemption threshold of 10 tpy

c) Operational Restrictions

- (1) Only natural gas shall be burned in this emissions unit.
- (2) The permittee shall maintain an outlet temperature from the thermal oxidizer of at least 1400 degrees F.
- (3) The permittee shall operate and maintain the thermal oxidizer in accordance with the manufacturer's recommendations and specifications and maintain records of all maintenance performed on the thermal oxidizer.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall operate and maintain the continuous temperature monitor and recorder to measure and record the combustion temperature within the thermal incinerator when the emissions unit is in operation.
- (2) The permittee shall install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired temperature. The temperature monitor and recorder shall be installed,



calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

- (3) The permittee shall maintain records of the following for the thermal oxidizer:
 - a. a log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit; and
 - b. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was less than 1350 degrees F.
- (4) The permittee shall maintain records of each day a fuel other than natural gas is burned in this emissions unit and/or the thermal oxidizer.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the Potential to Emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. 0.5 lb total HAPs/hour; 2.2 tons total HAPs/year based on a rolling, 12 month summation;
 - ii. Use of natural gas only as a fuel in the dehydrator and the thermal oxidizer; and
 - iii. Restrictions on the operating temperature of the thermal oxidizer used to control HAPs and VOC.
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted (postmarked) each year by the thirty-first of January (covering October to December), the thirtieth of April (covering January to March), the thirty-first of July (covering April to June), and the thirty-first of October (covering July to September), unless an alternative schedule has been established and approved by the director (the appropriate district office or local air agency).

[OAC rule 3745-15-03(B)(1)(b)] and [OAC rule 3745-15-03(C)]

f) Testing Requirements



- (1) Compliance with the emission limitations in section A.I of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

2.20 tpy VOC

Applicable Compliance Method:

If required, compliance shall be demonstrated by emission testing performed in accordance with US EPA method 25 or 25A for VOC or an approved alternative US EPA method to determine an hourly emission rate and by multiplying the hourly emission rate by the actual hours of operation and dividing by 2000 lbs/ton.
 - b. Emission Limitation:

0.020 lb PE/MMBtu of actual heat input

Applicable Compliance Method:

If required, compliance shall be determined through emission testing in accordance with US EPA Methods 1-5 of 40 CFR Part 60, Subpart A.
 - c. Emission Limitation:

20% opacity as a 6-minute average, except as provided by rule

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance through visible emission observations performed in accordance with US EPA Method 9, 40 CFR Part 60, Appendix A.
 - d. Emission Limitation:

0.5 lb total HAPs per hour; 2.2 tons total HAPs/year based on a rolling, 12 month summation.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the short term total HAPs emission limitation by conducting stack testing as specified in C.1.f.(2). The annual limit for this emissions unit is based on this short term limitation multiplied by 8760 hours/year and divided by 2000 lbs/ton. A demonstration of compliance with the short term limit and maintenance of the operating temperature of the thermal oxidizer used to control HAPs will assure compliance with the annual limit. Additional monthly record keeping is not required since the annual limit is at the emission unit's PTE.
- (2) The permittee shall conduct, or have conducted, emission testing for VOC emissions, total HAP emissions, and PE in accordance with the following requirements:



- a. Performance testing shall be conducted no later than 180 days following the startup of this emission unit and at approximately 2.5 years following the date of issuance of this permit.
- b. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rates:
 - Method 1, Appendix A, Part 60 to select the sampling ports locations and number of traverse points;
 - Method 2, 2F, or 2G, Appendix A, Part 60 to determine the velocity and volumetric flow-rate of the stack gases or an approved alternative;
 - Method 3A or 3B, Appendix A, Part 60, or an approved alternative method to determine the oxygen, excess air, and dry molecular weight of the stack gases;
 - Method 4, Appendix A, Part 60 or an approved alternative method to measure the moisture content of the stack gases;
 - Method 5, Appendix A, Part 60 or an approved alternative method for measuring PE;
 - Method 18, Appendix A, Part 60 or an approved alternative for total HAPs; and
 - Method 25 or 25A, Appendix A, Part 60 or an approved alternative for VOC emissions.
- c. Each performance test shall consist of three separate runs using the applicable test method. Each run shall last at least one hour and shall be conducted under the conditions specified in the Method. The arithmetic mean of the results of the three runs shall be used for the purpose of determining compliance with the limitations in this permit.
- d. The test(s) shall be conducted while the dehydrator is operating at its maximum normal operating load. Operations during periods of startup, shutdown, and malfunction shall not constitute representative conditions for the purpose of the performance test. The permittee shall make available to the Ohio EPA, Division of Air Pollution Control, Central Office and the Canton Local Air Agency, upon request, any records that may be necessary to determine the conditions of the performance tests.
- e. The permittee shall notify the Canton Local Air Agency in writing and at least 30 calendar days before a performance test is initially scheduled to begin, of plans to conduct a performance test ("Intent to Test (ITT)). The ITT notification shall describe in detail the proposed test methods and procedures, the monitored 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 Division of Air Pollution Control's refusal to accept the results of the emission test(s).



- f. Personnel from the appropriate Ohio EPA, Division of Air Pollution Control, District Office, local air agency, or Central 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 each emissions unit and the testing procedures provide a valid characterization of the emissions from each emissions unit.
- g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and shall be submitted to the appropriate Ohio EPA, Division of Air Pollution Control, District Office or local air agency within 30 days following completion of the test(s).
- h. In the event the permittee is unable to conduct the performance test on the date specified in the notification requirement due to unforeseeable circumstances beyond control, the permittee shall notify the Canton Local Air Agency as soon as practicable and without delay prior to the scheduled performance test date and specify the date when the performance test is rescheduled. This notification of delay in conducting the performance test shall not relieve the permittee of legal responsibility for compliance with any other applicable provisions of this part or with any other applicable federal, State, or local requirement.
- i. The permittee shall maintain performance test results and any other data needed to determine emissions from each emissions unit for a minimum of 5 years after the testing is conducted or after the data is collected. These records shall be made available for inspection by the Director of the Ohio EPA or his/her representative, upon request.

g) Miscellaneous Requirements

- (1) None.