



State of Ohio Environmental Protection Agency

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4/23/2009

Pamela Blakley *Via E-Mail Notification*  
United States Environmental Protection Agency  
Mail Code: AR-18J  
77 West Jackson Blvd.  
Chicago, IL 60604-3507

RE: PROPOSED AIR POLLUTION TITLE V PERMIT  
Facility Name: LUCAS COMPRESSOR STATION  
Facility ID: 0370000164  
Permit Type: Renewal  
Permit Number: P0087482

Dear Ms. Blakley:

A proposed OAC Chapter 3745-77 Title V permit for the referenced facility has been issued for review by U.S. EPA. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page <http://www.epa.state.oh.us/dapc> in Microsoft Word and Adobe Acrobat format. If U.S. EPA does not object to this proposed permit, the permit will be processed for issuance as a final action not less than 45 days from the date of this letter. Please contact me at (614) 644-3631 by the end of the 45 day review period if you wish to object to the proposed permit.

Sincerely,

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

Cc: Ohio EPA DAPC, Northwest District Office

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





State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**PROPOSED**

**Air Pollution Title V Permit**  
for  
**LUCAS COMPRESSOR STATION**

Facility ID: 0370000164

Permit Number: P0087482

Permit Type: Renewal

Issued: 4/23/2009

Effective: To be entered upon final issuance

Expiration: To be entered upon final issuance





State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Air Pollution Title V Permit**  
for  
**LUCAS COMPRESSOR STATION**

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State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Proposed Title V Permit**

**Permit Number:** P0087482

**Facility ID:** 0370000164

**Effective Date:** To be entered upon final issuance

## Authorization

Facility ID: 0370000164  
Facility Description: Natural Gas Transmission  
Application Number(s): A0018474, A0018475  
Permit Number: P0087482  
Permit Description: Renewal Title V Permit  
Permit Type: Renewal  
Issue Date: 4/23/2009  
Effective Date: To be entered upon final issuance  
Expiration Date: To be entered upon final issuance  
Superseded Permit Number: P0087481

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

LUCAS COMPRESSOR STATION  
EH&S (4C)  
1700 MacCorkle Avenue, S.E.  
Charleston, WV 25314

Ohio 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 Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Ohio EPA DAPC, Northwest District Office. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months (540 days) and no later than 6 months (180 days) prior to the expiration date.

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

**Proposed Title V Permit**

**Permit Number:** P0087482

**Facility ID:** 0370000164

**Effective Date:** To be entered upon final issuance

## **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. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions
  - (2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions
  - (3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting
  - (4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations  
*(Authority for term: ORC 3704.036(A))*

**2. 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 (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), 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.  
*(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))*
- 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 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.  
*(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))*
- c) The permittee shall submit required reports in the following manner:
  - (1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:



Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) constitutes a violation of an emission limitation (or control requirement) and, therefore, is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any scheduled maintenance, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

- (2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.



These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

- (3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.



If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

*(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))*

- (4) 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 (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."

*(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))*

- (5) Reports of any required monitoring and/or record keeping information shall be submitted to Ohio EPA DAPC, Northwest District Office.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

### **3. Scheduled Maintenance**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

### **4. Risk Management Plans**

If applicable, the permittee shall 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"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

- a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or
- b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

*(Authority for term: OAC rule 3745-77-07(A)(4))*

### **5. 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.

*(Authority for term: OAC rule 3745-77-07(A)(5))*



**6. Severability Clause**

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.  
*(Authority for term: OAC rule 3745-77-07(A)(6))*

**7. General Requirements**

- a) The permittee must comply with all terms and conditions of this permit. 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 reissuance, or modification, or for denial of a permit renewal application.
- 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, reopened, revoked, or revoked and reissued, for cause, in accordance with Standard Term and Condition A.11 below. 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, reopening 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.
- f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:
  - (1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or
  - (2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or
  - (3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminant sources once this permit ceases to be enforceable. The permittee



shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

*(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))*

**8. 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.

*(Authority for term: OAC rule 3745-77-07(A)(8))*

**9. Marketable Permit Programs**

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

*(Authority for term: OAC rule 3745-77-07(A)(9))*

**10. Reasonably Anticipated Operating Scenarios**

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.

*(Authority for term: OAC rule 3745-77-07(A)(10))*

**11. Reopening for Cause**

This Title V permit will be reopened prior to its expiration date under the following conditions:

- a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.



- d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.  
*(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))*

**12. Federal and State Enforceability**

Only those terms and conditions designated in this permit as federally enforceable, that 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, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

*(Authority for term: OAC rule 3745-77-07(B))*

**13. Compliance Requirements**

- a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V 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 paragraph (E) of OAC rule 3745-77-03.
  - (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 appropriate Ohio EPA District Office or local air agency 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.
- d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the



Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:

- (1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.
- (2) Compliance certifications shall include the following:
  - (a) An identification of each term or condition of this permit that is the basis of the certification.
  - (b) The permittee's current compliance status.
  - (c) Whether compliance was continuous or intermittent.
  - (d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.
  - (e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

(3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

*(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))*

**14. Permit Shield**

- a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.
- b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

*(Authority for term: OAC rule 3745-77-07(F))*

**15. Operational Flexibility**

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as



soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

*(Authority for term: OAC rules 3745-77-07(H)(1) and (2))*

## **16. Emergencies**

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

*(Authority for term: OAC rule 3745-77-07(G))*

## **17. Off-Permit Changes**

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

- a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.
- b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.
- c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).
- d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.
- e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

*(Authority for term: OAC rule 3745-77-07(I))*



**18. Compliance Method Requirements**

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.

*(This term is provided for informational purposes only.)*

**19. Insignificant Activities or Emissions Levels**

Each IEU that has one or more applicable requirements shall comply with those applicable requirements.

*(Authority for term: OAC rule 3745-77-07(A)(1))*

**20. Permit to Install Requirement**

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

*(Authority for term: OAC rule 3745-77-07(A)(1))*

**21. 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.

*(Authority for term: OAC rule 3745-77-07(A)(1))*

**22. Permanent Shutdown of an Emissions Unit**

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the responsible 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 responsible official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that 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 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

No emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

*(Authority for term: OAC rule 3745-77-01)*



**23. Title VI Provisions**

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

- a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.
- b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.
- c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.  
*(Authority for term: OAC rule 3745-77-01(H)(11))*

**24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only**

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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 (i.e., postmarked) 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.)

**25. Records Retention Requirements Under State Law Only**

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.

**26. Inspections and Information Requests**

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports



pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

*(Authority for term: OAC rule 3745-77-07(C))*

**27. Scheduled Maintenance/Malfunction Reporting**

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

**28. Permit Transfers**

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

*(Authority for term: OAC rule 3745-77-01(C))*

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

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation 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 (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

- a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or
- b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; or
- c) where the company's responsible official has certified that an emissions unit has been permanently shut down.



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## **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) 3.
2. The following insignificant emission units at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within the identified permit to install for the emission unit. The insignificant emission units listed below are subject to one or more applicable requirements contained in a permit-to-install or in the SIP-approved versions of OAC Chapters 3745-17, 3745-18 and 3745-21.
  - a) B007 (3.36 mmBtu/hr NG heating system boiler).
3. The following insignificant emissions units are exempt from permit requirements because they are not subject to any applicable requirements or because they meet the “de minimis” criteria established in OAC rule 3745-15-05:
  - a) T001 (12,000 gallon underground pipeline waste storage tank).
  - b) T002 (5000 gallon glycol storage tank);
  - c) T003 (3200 gallon lube oil storage tank);
  - d) T004 (3200 gallon lube oil storage tank);
  - e) T005 (2000 gallon mercaptan storage tank);
  - f) T006 (2000 gallon mercaptan storage tank);
  - g) T007 (9000 gallon waste water storage tank);
  - h) T008 (400 gallon used oil storage tank);
  - i) T009 (800 gallon used oil storage tank);
  - j) T010 (8000 gallon methanol underground storage tank);
  - k) T011 (6000 gallon pipeline liquids underground storage tank);
  - l) T012 (6000 gallon pipeline liquids underground storage tank);
  - m) T013 (10,000 gallon new TEG storage tank);
  - n) T014 (10,000 gallon used TEG storage tank);
  - o) T015 (4000 gallon MEG storage tank); and
  - p) T016 (5000 gallon pipeline liquids storage tank).
4. The following emissions units contained in this permit are subject to 40 CFR Part 63, Subparts HHH, National Emission Standards for Hazardous Air Pollutants for Natural Gas Transmission and Storage: P001 and P002. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA District office or local air agency.



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The permittee shall comply with all applicable requirements of 40 CFR Part 63, Subpart HHH. The permittee shall also comply with all applicable requirements of 40 CFR Part 63, Subpart A (General Provisions) as identified in Table 2 of 40 CFR Part 63, Subpart HHH. Compliance with all applicable requirements shall be achieved by the dates set forth in 40 CFR Part 63, Subpart HHH, and Subpart A.

5. The following emissions units contained in this permit are subject to 40 CFR Part 63, Subparts ZZZZ, National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines (RICE): P003, P004, P005, P006 and P007. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA District office or local air agency.



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



**1. B006, RECIP ENGINE/GENERATOR #095G1**

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

EMERGENCY GENERATOR: A NATURAL GAS-FIRED RECIPROCATING ENGINE GENERATING ELECTRICITY.

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 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) (PTI# 03-7588, issued on 12/22/93)	3.55 lbs nitrogen oxides (NOx)/hr, 15.55 tons NOx/yr  0.06 lb particulate emissions (PE)/hr, 0.26 ton PE/yr  1.45 lbs carbon monoxide (CO)/hr, 6.35 tons CO/yr  0.74 lb organic compounds (OC)/hr, 3.24 tons OC/yr  The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-11(B)(5)(b) and 3745-17-07(A).
b.	OAC rule 3745-17-11(B)(5)(a)	0.310 lb PE/mmBtu actual heat input
c.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
d.	OAC rule 3745-18-06(G)	See b)(2)a.
e.	40 CFR, Part 63, Subpart ZZZZ (40 CFR 63.6580-6675)  [In accordance with 40 CFR 63.6590 (a)(1)(ii), this emissions unit is an existing stationary reciprocating internal combustion engine with a site rating of less than 500 brake	See b)(2)b.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	HP.]	

(2) Additional Terms and Conditions

- a. Since the rated heat input capacity for this emissions unit is less than 10 mmBtu/hr, this emissions unit is exempt from the sulfur dioxide emission limitation in OAC rule 3745-18-06(G), pursuant to OAC rule 3745-18-06(B). Also, natural gas is the only fuel fired in this emissions unit and, therefore, this emissions unit is exempt from the sulfur dioxide emission limitation in OAC rule 3745-18-06(G), pursuant to OAC rule 3745-18-06(A).
- b. This emission unit does not have to meet the requirement of this subpart and of subpart A in accordance with 40 CFR 63.6590(b)(3) because it is an existing emergency stationary reciprocating internal combustion engine (RICE). In addition, no initial notification is required.

c) Operational Restrictions

- (1) The permittee shall burn only natural gas as fuel in this emissions unit.  
[OAC rule 3745-77-07(A)(1) and PTI #03-7588]

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.  
[OAC rule 3745-77-07(C)(1) and PTI #03-7588]

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas is in use in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.  
[OAC rule 3745-77-07(C)(1) and PTI #03-7588]

f) Testing Requirements

- (1) Compliance with the emission limitations in Section b)(1) of these terms and conditions shall be determined in accordance with the following methods:



- a. Emission Limitations:  
0.310 lb PE/mmBtu of actual heat input

Applicable Compliance Method:

The permittee may determine compliance with the PE limitations above based on an emission factor from AP-42, Table 3.2-2 (revised 7/00) of 0.0000771 lb PE (filterable)/mmBtu of actual heat input.

If required, the permittee shall demonstrate compliance with the PE limitations above in accordance with Methods in OAC rule 3745-17-03(B)(10).

[OAC rule 3745-77-07(C)(1) and PTI #03-7588]

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

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible PE limitation above in accordance with the methods specified in OAC rule 3745-17-03(B)(1).

[OAC rule 3745-77-07(C)(1) and PTI #03-7588]

- c. Emission Limitations:  
3.55 lbs NO<sub>x</sub>/hr, 15.55 tons NO<sub>x</sub>/yr

Applicable Compliance Method:

The permittee may determine compliance with the hourly allowable NO<sub>x</sub> emission limitation by multiplying the appropriate emission factor from AP-42, Table 3.2-2 (revised 7/00) by the maximum hourly heat input rate (3.2 mmBtu/hr).

If required, compliance with the hourly allowable NO<sub>x</sub> emission limitation shall be determined in accordance with Methods 1 through 4 and 7 of 40 CFR, Part 60, Appendix A.

Provided compliance is shown with the hourly allowable NO<sub>x</sub> emission limitation, compliance with the annual limitation shall be ensured (the annual allowable limitation was developed by multiplying the hourly allowable limitation by 8760, and then dividing by 2000).

[OAC rule 3745-77-07(C)(1) and PTI #03-7588]

- d. Emission Limitations:  
1.45 lbs CO/hr and 6.35 tons CO/yr

Applicable Compliance Method:

The permittee may determine compliance with the hourly allowable CO emission limitation by multiplying the appropriate emission factor from AP-42, Table 3.2-2 (revised 7/00) by the maximum hourly heat input rate (3.2 mmBtu/hr).



If required, compliance with the hourly allowable CO emission limitation shall be determined in accordance with Methods 1 through 4 and 10 of 40 CFR, Part 60, Appendix A.

Provided compliance is shown with the hourly allowable CO emission limitation, compliance with the annual limitation shall be ensured (the annual allowable limitation was developed by multiplying the hourly allowable limitation by 8760, and then dividing by 2000).

[OAC rule 3745-77-07(C)(1) and PTI #03-7588]

- e. Emission Limitations:  
0.06 lb PE/hr and 0.26 ton PE/yr

Applicable Compliance Method:

The permittee may determine compliance with the hourly PE limitation by multiplying the emission factor from AP-42, Table 3.2-2 (revised 7/00) of 0.0000771 lb PE (filterable)/mmBtu of actual heat input by the maximum heat input rate of the emissions unit (3.2 mmBtu/hr).

If required, the permittee shall demonstrate compliance with the hourly PE limitation above in accordance with Methods 1 through 5 of 40 CFR, Part 60, Appendix A.

Provided compliance is shown with the hourly allowable PE limitation, compliance with the annual limitation shall be ensured (the annual allowable limitation was developed by multiplying the hourly allowable limitation by 8760, and then dividing by 2000).

[OAC rule 3745-77-07(C)(1) and PTI #03-7588]

- f. Emission Limitations:  
0.74 lbs OC/hr and 3.24 tons OC/yr

Applicable Compliance Method:

The permittee may also determine compliance with the hourly allowable OC emission limitation by multiplying the appropriate emission factor from AP-42, Table 3.2-2 (revised 7/00) by the maximum hourly heat input rate (3.2 mmBtu/hr).

If required, the permittee shall demonstrate compliance with the hourly OC limitation above in accordance with Methods 18 and 25 or 25A of 40 CFR, Part 60, Appendix A.

Provided compliance is shown with the hourly allowable OC emission limitation, compliance with the annual limitation shall be ensured (the annual allowable limitation was developed by multiplying the hourly allowable limitation by 8760, and then dividing by 2000).

- g) Miscellaneous Requirements

- (1) None.



**2. Emissions Unit Group - Group 1: B008, B009,**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
B008	LINE HEATER: A NATURAL GAS-FIRED INDIRECT PROCESS HEATER.
B009	LINE HEATER: A NATURAL GAS-FIRED INDIRECT PROCESS HEATER.

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 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) (PTI #03-17299, issued on 7/26/07)	See b)(2)a.
b.	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
c.	OAC rule 3745-17-10(B)(1)	0.020 lb PE/mmBtu of actual heat input  See b)(2)b.
d.	OAC rule 3745-18-06	See b)(2)c.
e.	OAC rule 3745-21-08(B)	See b)(2)d.
f.	40 CFR Part 63.52(a)(2)	See b)(2)e.
g.	40 CFR, Part 60, Subpart Dc	See c)(1) and d)(2)

(2) Additional Terms and Conditions

a. The BAT requirements under OAC rule 3745-31-05(A)(3)(a) do not apply to the nitrogen oxides (NOx), carbon monoxide (CO), particulate emissions (PE), particulate matter 10 microns or less in size (PM10), and sulfur dioxide (SO2) emissions from this air contaminant source since the uncontrolled potential to emit for NOx, CO, PE, PM10, and SO2 are each less than ten tons per year.

The potential to emit for NOx was determined by dividing the maximum emission rate of 100 lbs NOx/10<sup>6</sup> scf of natural gas (AP-42, Section 1.4, Table 1.4-1, 7/98) by a heat content of 1020 Btu/scf, and multiplying by a maximum heat input of 12.0 mmBtu/hr, a maximum operating schedule of 8,760 hrs/yr, and a conversion factor of 1 ton/2000 lbs.

The potential to emit for CO emissions equals 4.33 tons/yr and was determined by dividing the maximum emission rate of 84 lbs CO/10<sup>6</sup> scf of natural gas (AP-



42, Section 1.4, Table 1.4-1, 7/98) by a heat content of 1020 Btu/scf, and multiplying by a maximum heat input of 12.0 mmBtu/hr, a maximum operating schedule of 8,760 hrs/yr, and a conversion factor of 1 ton/2000 lbs.

The potential to emit for PE equals 0.1 ton/yr and was determined by dividing the maximum emission rate of 1.9 lbs PE/10<sup>6</sup> scf of natural gas (AP-42, Section 1.4, Table 1.4-2, 7/98) by a heat content of 1020 Btu/scf, and multiplying by a maximum heat input of 12.0 mmBtu/hr, a maximum operating schedule of 8,760 hrs/yr, and a conversion factor of 1 ton/2000 lbs.

The potential to emit for PM10 emissions equals 0.39 ton/yr and was determined by dividing the maximum emission rate of 7.6 lbs PM10/10<sup>6</sup> scf of natural gas (AP-42, Section 1.4, Table 1.4-2, 7/98) by a heat content of 1020 Btu/scf, and multiplying by a maximum heat input of 12.0 mmBtu/hr, a maximum operating schedule of 8,760 hrs/yr, and a conversion factor of 1 ton/2000 lbs.

The potential to emit for SO2 emissions equals 0.03 ton/yr and was determined by dividing the maximum emission rate of 0.6 lb SO2/10<sup>6</sup> scf of natural gas (AP-42, Section 1.4, Table 1.4-2, 7/98) by a heat content of 1020 Btu/scf, and multiplying by a maximum heat input of 12.0 mmBtu/hr, a maximum operating schedule of 8,760 hrs/yr, and a conversion factor of 1 ton/2000 lbs.

- b. The potential to emit for PE from this emissions unit [see b)(2)a.] is less than the allowable emission limitation established pursuant to this rule.
- c. The emissions unit is exempt from the requirements of OAC rule 3745-18-06 in accordance with OAC rule 3745-18-06(A).
- d. The design of the emissions unit and the technology associated with the current operating practices satisfy the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B).

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. On June 24, 2003, that rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP), however, until the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

- e. This emissions unit is subject to a case-by-case MACT determination pursuant to section 112(j) of the Clean Air Act (CAA) due to the June 8, 2007 D.C. Circuit Court of Appeals decision to vacate the Boiler MACT (40 CFR Part 63, Subpart DDDDD).

If notified by the Ohio EPA or U.S. EPA, the permittee shall submit an application for a revision to this Title V permit that meets the requirements of 40 CFR 63.52(a)(2) pertaining to case-by-case MACT determinations. The 30-day clock for submittal of a 112(j) application does not begin until such notification is made by Ohio EPA or U.S. EPA.



c) Operational Restrictions

- (1) The permittee shall burn only natural gas in this emissions unit.

[OAC rule 3745-77-07(A)(1) and PTI #03-17299]

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.

[OAC rule 3745-77-07(C)(1) and PTI #03-17299]

- (2) The permittee shall collect and record the amount of fuel (natural gas) combusted during each calendar month.

[OAC rule 3745-77-07(C)(1) and PTI #03-17299]

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than pipeline quality natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

[OAC rule 3745-77-07(C)(1) and PTI #03-17299]

- (2) This emissions unit is subject to the applicable provisions of Subpart Dc of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60.

The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.

[OAC rule 3745-77-07(C)(1) and PTI #03-17299]

f) Testing Requirements

- (1) Compliance with the emission limitations in the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation:

Visible PE shall not exceed 20% opacity, as a 6-minute average except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be demonstrated in accordance with OAC rule 3745-17-03(B)(1).

[OAC rule 3745-77-07(C)(1) and PTI #03-17299]



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g) Miscellaneous Requirements

(1) None



**3. Emissions Unit Group - Group 2: P001, P002,**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
P001	TEG Dehydration unit (nominal gas flow rate of 200 MMscf/ day) with 2.9 MMBtu/hr natural gas-fired reboiler, controlled by 4.4 MMBtu/hr natural gas-fired flare
P002	TEG Dehydration unit (nominal gas flow rate of 200 MMscf/ day) with 2.9 MMBtu/hr natural gas-fired reboiler, controlled by 4.4 MMBtu/hr natural gas-fired flare

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) d)(5), d)(6), d)(7), d)(8) and e)(5)

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.

	<b>Applicable Rules/Requirements</b>	<b>Applicable Emissions Limitations/Control Measures</b>
a.	ORC 3704.03(F)(3)(c) OAC rule 3745-114-01	See d)(5), d)(6), d)(7), d)(8), and e)(5)
b.	OAC rule 3745-31-05(A)(3) (PTI #03-17413, issued on 2/26/08)	See b)(2)a. and b)(2)b.
c.	OAC rule 3745-31-05(A)(3) (PTI #03-17413, issued on 2/26/08)	2.10 pounds of volatile organic compounds (VOC) per hour; 4.60 tons of VOC per year [See b)(2)c.]  0.0198 lb of benzene per million standard cubic foot (MMscf) of natural gas processed; 0.36 tons of benzene per year [See b)(2)d.]
d.	OAC rule 3745-17-10(B)	0.020 lbs of particulate emissions (PE) per MMBtu of actual heat input from natural gas combustion in regenerator
e.	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) from the regenerator combustion exhaust stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
f.	OAC rule 3745-17-11(B)	See b)(2)f. (for flare)
g.	OAC rule 3745-17-07(A)	See b)(2)g. (for flare)
h.	OAC rule 3745-18-06	See b)(2)i.
i.	OAC rule 3745-18-06(E)	See b)(2)e.
j.	OAC rule 3745-21-08(B)	See b)(2)h.
k.	40 CFR, Part 63, Subpart HHH (40 CFR 63.1270-1289)	Exempt, See b)(2)j.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	[In accordance with 40 CFR 63.1270(a) and (b), these emissions units are glycol dehydration units at a natural gas transmission and storage facility.	See d)(9) and f)(2)
I.	40 CFR 63. 1-15 (40 CFR 63.1274)	Table 2 to Subpart HHH of 40 CFR, Part 63 - Applicability of General Provisions to Subpart HHH shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

- a. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE from this air contaminant source since the calculated annual emission rate for PE is less than ten tons per year taking into account the federally enforceable rule limit of 0.02 pounds of PE per million Btu of actual heat input under OAC rule 3745-17-10(C)(1).
- b. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO), sulfur dioxide (SO<sub>2</sub>), and emissions of particulate matter less than ten microns in size (PM<sub>10</sub>) from this air contaminant source since the uncontrolled potentials to emit for NO<sub>x</sub>, CO, SO<sub>2</sub>, and PM<sub>10</sub> is each less than ten tons per year.
- c. Permit to Install 03-17413 for this air contaminant source takes into account the following voluntary restrictions as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3).
  - i. use of a flare achieving a 98% destruction efficiency for VOC emissions from the regenerator.

The potential to emit for VOC emissions from the flare is 4.60 tons VOC/year and was determined by adding natural gas combustion emissions and the 2% uncontrolled emissions from the flare. Natural gas combustion emissions were determined by multiplying the AP-42 emission factor from Table 13.5-1 (reformatted 1/1995), of 0.14 lb VOC/MMBtu, by the maximum firing capacity (4.40 MMBtu/hr). Uncontrolled flare emissions were determined by employing the GRI's GLYCalc, Version 4.0 computer program taking into account a flare control efficiency of 98 percent, by weight for the dehydrator emissions. The resulting hourly emission rate of combustion and uncontrolled emissions (2.10 lbs/hr) was multiplied by a maximum operating schedule of 4,380 hours per year. The maximum operating schedule is based on a physical constraint associated with dehydration demands.

VOC emissions from natural gas combustion from the regenerator are considered negligible for permitting purposes.



- d. Permit to Install 03-17413 for this air contaminant source takes into account the following voluntary restrictions as proposed by the permittee for the purpose of establishing legally and practically enforceable requirements representing the potential to emit for emissions of benzene
  - i. 0.0198 pound of benzene per MMscf of natural gas processed based on 98 percent destruction efficiency for the flare.

The annual emission rate for benzene from this emissions unit is 0.36 ton per year and was determined by multiplying the emission limitation of 0.0198 pound of benzene per MMscf of natural gas processed by a maximum annual throughput of 36,364 MMscf of natural gas.

The voluntary restriction is being established to avoid the control requirements of 40 CFR, Part 63, Subpart HHH in accordance with 40 CFR 63.1274(d)(2). Hence, there are no requirements established pursuant to 40 CFR 63.1274(d)(2) because the benzene emissions from this emissions unit are limited to less than 1 ton per year.

- e. There are no sulfur dioxide emission limitations established by OAC rule 3745-18 for equipment associated with these emissions units that are not considered "fuel burning equipment" because the process weight rate is less than 1000 pounds per hour and is therefore exempt pursuant to OAC rule 3745-18-06(C).
- f. The uncontrolled mass rate of particulate emissions from the flare is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11 (A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight rate is equal to zero. "Process weight" is defined in OAC rule 3745-17-01 (B)(17).
- g. The emissions from the flare are exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.
- h. The "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08 (B) are satisfied by the design of the emissions unit.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. On June 24, 2003, that rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP), however, until the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

- i. The combustion emissions from the regenerator are exempt from the requirements of OAC rule 3745-18-06 in accordance with OAC rule 3745-18-06(A).
- j. The voluntary restrictions outlined in section b)(2)d. are being established to avoid the requirements of 40 CFR 63.1274(c) in accordance with the exemption



in 40 CFR 63.1274(d)(2). To meet this exemption, the actual average emissions of benzene from this emission unit must be less than 0.90 megagram per year (0.89 tons per year) as determined by the procedures specified in 40 CFR 63.1282(a)(2). PTI #03-17413 limits benzene emissions to 0.36 ton per year.

c) Operational Restrictions

(1) The flare shall be operated and maintained in accordance with the following:

- a. The flare shall be designed and operated with no visible emissions as determined by "Method 22, 40 CFR, Part 60, Appendix A," except for periods not to exceed a total of five minutes during any 120 consecutive minutes.
- b. The flare shall be operated with either an electric arc ignition system or a pilot flame. If a pilot flame is employed, the flame shall be present at all times. If an electric arc ignition system is employed, the arcing shall pulse continually.
- c. The net heating value of the gas being controlled in the flare, as determined by the method specified in Paragraph (P)(2) of Rule 3745-21-10 of the Administrative Code, shall be 200 Btu/scf or greater.
- d. The flare shall be designed and operated with an actual exit velocity, as determined by the method specified in Paragraph (P)(3) of Rule 3745-21-10 of the Administrative Code, less than 60 feet per second.
- e. the permittee shall ensure the flare is operated and maintained in conformance with its design.

[OAC rule 3745-77-07(A)(1) and PTI #03-17413]

(2) The permittee shall burn natural gas as the singular fuel supplement for this emissions unit.

[OAC rule 3745-77-07(A)(1) and PTI #03-17413]

d) Monitoring and/or Recordkeeping Requirements

(1) For each day during which the permittee burns a supplemental fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17413]

(2) The flare shall be monitored with a thermocouple or any other equivalent device to detect the presence of a pilot flame. If an electric arc ignition system is employed, the arcing shall be monitored to detect any failure.

[OAC rule 3745-77-07(C)(1) and PTI #03-17413]

(3) The permittee shall properly install, operate, and maintain a device to continuously monitor the pilot flame when the emissions unit is in operation. The monitoring device and any recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.



The permittee shall record the following each day:

- a. All periods of time during which there was no pilot flame.
- b. A log of the downtime for the flare and monitoring equipment when the associated emissions unit was in operation.

[OAC rule 3745-77-07(C)(1) and PTI #03-17413]

(4) The permittee shall collect and record the following information each month for this emissions unit:

- a. the amount of natural gas processed in this emissions unit;
- b. the benzene emissions, in pounds, calculated using GRI's GLYCalc, Version 4.0 computer program based on the amount of natural gas processed and the 98% destruction efficiency; and
- c. the annual, year to date, benzene emissions from processed natural gas [sum of (a) for each calendar month to date from January to December].

[OAC rule 3745-77-07(C)(1) and PTI #03-17413]

(5) The permit to install for emissions units P001 and P002 was evaluated based on the actual materials and the design materials and the design parameters of the emissions units' exhaust system, as specified by the permittee in the permit application. The "Toxic Air Contaminant Statue", ORC 3704.03(F), was applied to these emissions units for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year (in addition to benzene that emits less than one ton per year) using an air dispersion model such as SCREEN 3.0, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration results from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxics Emissions, Option A", as follows:

- a. the exposure limit, expressed as time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound emitted from the emission units, (as determined from the raw materials processed has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
  - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
  - ii. STEL (short term exposure limit) or the ceiling value from the ACGIH "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by



0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions units, i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the MAGLC:

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Toxic Contaminant: Benzene TLV (mg/m3): 1.5973  
 Maximum Hourly Emission Rate (lbs/hr): 0.3306  
 Predicted 1-Hour Maximum Ground-Level Concentration (µg/m3): 8.317  
 MAGLC (µg/m3): 38.03

Toxic Contaminant: Toluene TLV (mg/m3): 188.405  
 Maximum Hourly Emission Rate (lbs/hr): 0.4810  
 Predicted 1-Hour Maximum Ground-Level Concentration (µg/m3): 12.10  
 MAGLC (µg/m3): 4485.8

Toxic Contaminant: Xylene TLV (mg/m3): 434.192  
 Maximum Hourly Emission Rate (lbs/hr): 0.6678  
 Predicted 1-Hour Maximum Ground-Level Concentration (µg/m3): 16.81  
 MAGLC (µg/m3): 10337.9

The permittee, has demonstrated that emissions of benzene, toluene and xylene, from emissions units P001 and P002, is calculated to be less than eighty per cent of the MAGLC; any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statue", ORC 3704.03(F).

[PTI #03-17413]

- (6) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower TLV than the lowest TLV previously modeled;



- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
- c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statue" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statue", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification" or if a new toxic is emitted, or the modeled toxic(s) is/are expected to exceed the previous modeled level(s), then the permittee shall apply for and obtain a final permit-to-install prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit-to-install application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and may require the permittee to submit a permit-to-install application for the increased emissions.

[PTI #03-17413]

- (7) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statue", ORC 3704.03(F):
  - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
  - b. the MAGLC for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statue", ORC 3704.03(F);
  - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statue", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
  - d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statue", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

[PTI #03-17413]

- (8) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statue", ORC 3704.03(F), through the predicted 1-hour maximum ground-



level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

[PTI #03-17413]

- (9) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR, Part 63, Subpart HHH, including the following sections:

63.1284(d)(2)	Recordkeeping requirements for emission units exempt from control requirements under 63.1274(d) – NOTE: The company satisfies this requirement by maintaining the records as required by d)(4).
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[OAC rule 3745-77-07(c)(1) and 40 CFR Part 63, Subpart HHH]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. all periods of time during which there was no pilot flame (the reports shall include the date, time, and duration of each such occurrence); and
  - b. all exceedances of the 0.0198 pound of benzene per MMscf of natural gas processed.

The quarterly deviation reports shall be submitted in accordance with the Standard Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17413]

- (2) The permittee shall submit deviation (excursion) reports that identify each day when a supplemental fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

[OAC rule 3745-77-07(C)(1) and PTI #03-17413]

- (3) The permittee shall submit annual written reports that summarize the actual annual OC (benzene) emissions. The reports shall be submitted by January 31 of each year, shall include the calculations, and shall cover the previous calendar year.

[OAC rule 3745-77-07(C)(1) and PTI #03-17413]

- (4) The permittee shall submit quarterly summaries that include a log of the downtime for the flare and monitoring equipment when the associated emissions unit was in operation.

[OAC rule 3745-77-07(C)(1) and PTI #03-17413]

- (5) The permittee shall submit annual reports to the appropriate Ohio EPA District Office of local air agency, documenting any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the "Toxic Air Contaminant Statue", ORC 3704.03(F), through the predicted 1-hour maximum ground-



level concentration. If no changes to the emissions unit(s) or the exhaust stack have been made, then the report shall include a statement to this effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.

[PTI #03-17413]

f) Testing Requirements

(1) Compliance with the allowable emission limitations in Section b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:  
2.10 pounds of VOC per hour

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable VOC emission limitation by adding natural gas combustion emissions and the 2% uncontrolled emissions from the flare. Natural gas combustion emissions were determined by multiplying the AP-42 emission factor from Table 13.5-1 (reformatted 1/1995), of 0.14 lb VOC/MMBtu, by the maximum firing capacity (4.40 MMBtu/hr). Uncontrolled flare emissions were determined by employing the GRI's GLYCalc, Version 4.0 computer program taking into account a flare control efficiency of 98 percent, by weight for the dehydrator emissions.

[OAC rule 3745-77-07(C)(1) and PTI #03-17413]

b. Emission Limitation:  
4.60 tons of VOC per year

Applicable Compliance Method:

The permittee shall demonstrate compliance with the annual allowable VOC emission limitation by multiplying the hourly emission limitation by a maximum operating schedule of 4,380 hours per year. The maximum operating schedule is based on a physical constraint associated with dehydration demands.

[OAC rule 3745-77-07(C)(1) and PTI #03-17413]

c. Emission Limitation:  
0.020 lbs of PE per MMBtu of actual heat input from natural gas combustion in regenerator

Applicable Compliance Method:

The permittee shall demonstrate compliance by multiplying the AP-42 emission factor from Table 1.4-2 (revised 7/1998), of 7.6 lbs PE/MMscf by the heat content of scf/1020 Btu. If required, the permittee shall demonstrate compliance with the PE limitation above pursuant to OAC rule 3745-17-03(B)(9).

[OAC rule 3745-77-07(C)(1) and PTI #03-17413]

d. Emission Limitation:  
0.0198 lbs of benzene per million standard cubic foot of natural gas processed



Applicable Compliance Method:

The permittee shall demonstrate compliance with the allowable benzene emission limitation by employing the GRI's GLYCalc, Version 4.0 computer program utilizing a flare control efficiency of 98 percent, by weight, in addition to the amount of natural gas processed.

[OAC rule 3745-77-07(C)(1) and PTI #03-17413]

e. Emission Limitation:

0.36 ton of benzene per year

Applicable Compliance Method:

The permittee shall demonstrate compliance with the annual allowable benzene emission limitation through the recordkeeping requirements specified in section d)(4) and the test methods, compliance procedures and compliance demonstrations specified in f)(2).

[OAC rule 3745-77-07(C)(1) and PTI #03-17413]

f. Emission Limitation:

Visible PE emissions from the regenerator combustion exhaust stack shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible PE limitation in accordance with the methods specified in OAC rule 3745-17-03(B)(1).

[OAC rule 3745-77-07(C)(1) and PTI #03-17413]

- (2) The permittee shall comply with the applicable test methods, compliance procedures and compliance demonstrations as required under 40 CFR, 63 Subpart HHH, including the following sections:

63.1282(a)(2)	Determination of glycol dehydration unit benzene emissions
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[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart HHH]

g) Miscellaneous Requirements

- (1) None.



**4. Emissions Unit Group - Group 3: P003, P004, P005, P006, P007,**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
P003	PRIME MOVER: A NATURAL GAS-FIRED RECIPROCATING ENGINE COMPRESSING NATURAL GAS. (13.6 mmBtu/hr)
P004	PRIME MOVER: A NATURAL GAS-FIRED RECIPROCATING ENGINE COMPRESSING NATURAL GAS. (13.6 mmBtu/hr)
P005	PRIME MOVER: A NATURAL GAS-FIRED RECIPROCATING ENGINE COMPRESSING NATURAL GAS. (13.6 mmBtu/hr)
P006	PRIME MOVER: A NATURAL GAS-FIRED RECIPROCATING ENGINE COMPRESSING NATURAL GAS. (32.4 mmBtu/hr)
P007	PRIME MOVER: A NATURAL GAS-FIRED RECIPROCATING ENGINE COMPRESSING NATURAL GAS. (32.4 mmBtu/hr)

- 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 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 3745-17-11(B)(5)(b)	0.062 lb particulate emissions (PE)/mmBtu of actual heat input
b.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
c.	OAC rule 3745-18-06(G)	See b)(2)a.
d.	40 CFR, Part 63, Subpart ZZZZ (40 CFR 63.6580-6675)  [In accordance with 40 CFR 63.6590 (a)(1)(i), these emissions units are all existing stationary reciprocating internal combustion engines with a site rating of more than 500 brake HP.]	See b)(2)b.



(2) Additional Terms and Conditions

- a. Since natural gas is the only fuel fired in this emissions unit, it is exempt from the sulfur dioxide emission limitation in OAC rule 3745-18-06(G), pursuant to OAC rule 3745-18-06(A).
- b. These emission units do not have to meet the requirement of this subpart and of subpart A in accordance with 40 CFR 63.6590(b)(3) because it is an existing spark ignition 2 stroke lean burn (2SLB) stationary reciprocating internal combustion engine (RICE) with a site rating of more than 500 brake horsepower at a major source. In addition, no initial notification is required.

c) Operational Restrictions

- (1) The permittee shall burn only natural gas as fuel in this emissions unit.

[OAC rule 3745-77-07(A)(1)]

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.

[OAC rule 3745-77-07(C)(1)]

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. Each report shall be submitted within 30 days after the deviation occurs.

[OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

- (1) Compliance with the emission limitations in Section b)(1) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitations:  
0.062 lb PE/mmBtu of actual heat input

Applicable Compliance Method:

The permittee may determine compliance with the PE limitation above based on an emission factor from AP-42, Table 3.2-1 (revised 7/00) of 0.0384 lb PE (filterable)/mmBtu of actual heat input.

If required, the permittee shall demonstrate compliance with the PE limitations above in accordance with Methods in OAC rule 3745-17-03(B)(10).

[OAC rule 3745-77-07(C)(1)]



b. Emission Limitation:

Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible PE limitation above in accordance with the methods specified in OAC rule 3745-17-03(B)(1).

[OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.