



State of Ohio Environmental Protection Agency

STREET ADDRESS:

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50 W. Town St., Suite 700
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P.O. Box 1049
Columbus, OH 43216-1049

10/9/2009

Kasey Gabbard
WELLINGTON COMPRESSOR STATION
Environmental Health & Safety Department
P. O. Box 1273
Charleston, WV 25325-1273

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1652000021
Permit Number: P0105232
Permit Type: Renewal
County: Medina

Certified Mail

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

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, Medina County Gazette. 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.ohio.gov/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 Akron Regional Air Quality Management District
146 South High Street, Room 904
Akron, OH 44308

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 Akron Regional Air Quality Management District at (330)375-2480.

Sincerely,

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

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
ARAQMD; Canada



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Wellington Compressor Station, located at 13292 Smith Road, Wellington, Medina County, OH, employs two (2) two natural gas pipeline heaters (Emissions Units (EUs) B009 and B010), an emergency electrical generator (EU B014), and two (2) glycol natural gas dehydrators (EUs P002 & P003), which remove the water content of natural gas prior to transport. Emissions from EUs B009, B010, and B014 are uncontrolled. Emissions from EUs P002 and P003 are vented to and controlled by a common flare.

3. Facility Emissions and Attainment Status:

Unrestricted and uncontrolled potential emissions of volatile organic compounds (VOC) and hazardous air pollutants (HAP) from EUs P002 and P003 combined are, respectively, 138.5 tons per year and 99.0 tons per year, making this facility a potential major Title V source of VOC and HAP. On the other hand, unrestricted and uncontrolled potential facility emissions of nitrogen oxides (NOx), carbon monoxide (CO), sulfur dioxide (SO2), and lead are below applicable Title V thresholds. Medina County is part of an eight-hour ozone NAAQS moderate nonattainment area in northeast Ohio.

4. Source Emissions:

Wellington Compressor Station has applied for a federally enforceable permit to install/operate (FEPTIO) to continue the federally enforceable employment of a flare designed and operated with a 98% organic compound (OC) emissions destruction efficiency, following applicable specifications of 40 CFR 60.18, to limit potential facility emissions of VOC and HAP below applicable Title V emissions thresholds. Per the application, all OC are VOC, and all HAP are VOC. Therefore, the VOC emission rate is equal to the OC emission rate, but the total HAP emission rate is less than the VOC emission rate. The flare will reduce combined potential annual emissions from EUs P002 and P003 to 2.77 tons of VOC and 1.98 total HAP, thus limiting annual facility emissions to 4.01 tons of VOC and 2.17 tons of total HAP per unrestricted, 8760-hour facility operations schedule.

5. Conclusion:

Making the continued use of a flare, as specified above, to destroy VOC and HAP emissions from the dehydration units a federally enforceable requirement in the FEPTIO should ensure potential facility emissions of VOC and HAP remain below applicable Title V emissions thresholds. Use of a flare as a federally enforceable control device also ensures exemption from MACT Subpart HHH control, monitoring, recordkeeping & reporting requirements in accordance with 40 CFR 63.1274(d)(2).

6. Please provide additional notes or comments as necessary:

None



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Permit Strategy Write-Up
Permit Number: P0105232
Facility ID: 1652000021

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons</u>	<u>Per</u>
	<u>Year(facility-</u>	
	<u>wide)</u>	
VOC	4.01	
HAP	2.17	
NOx	34.27	
CO	91.67	

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install and Operate
WELLINGTON COMPRESSOR STATION

Issue Date: 10/9/2009
Permit Number: P0105232
Permit Type: Renewal
Permit Description: Renewal FEPTIO for a natural gas compressor station facility.
Facility ID: 1652000021
Facility Location: WELLINGTON COMPRESSOR STATION
13292 Smith Road,
Medina Twp., OH 44090
Facility Description: Pipeline Transportation of Natural Gas

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 Russell Risley at Akron Regional Air Quality Management District, 146 South High Street, Room 904 or (330)375-2480. The permit can be downloaded from the Web page: www.epa.ohio.gov/dapc



**State of Ohio Environmental Protection Agency
Division of Air Pollution Control**

DRAFT

**Air Pollution Permit-to-Install and Operate
for
WELLINGTON COMPRESSOR STATION**

Facility ID: 1652000021
Permit Number: P0105232
Permit Type: Renewal
Issued: 10/9/2009
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 Permit-to-Install and Operate
for
WELLINGTON COMPRESSOR STATION

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State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0105232

Facility ID: 1652000021

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 1652000021
Application Number(s): A0037707
Permit Number: P0105232
Permit Description: Renewal FEPTIO for a natural gas compressor station facility.
Permit Type: Renewal
Permit Fee: \$0.00 *DO NOT send payment at this time - subject to change before final issuance*
Issue Date: 10/9/2009
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:

WELLINGTON COMPRESSOR STATION
13292 Smith Road
Medina Twp., OH 44090

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:

Akron Regional Air Quality Management District
146 South High Street, Room 904
Akron, OH 44308
(330)375-2480

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: P0105232

Facility ID: 1652000021

Effective Date: To be entered upon final issuance

Authorization (continued)

Permit Number: P0105232

Permit Description: Renewal FEPTIO for a natural gas compressor station facility.

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

Emissions Unit ID:	B014
Company Equipment ID:	RECIP ENGINE/GENERATOR #101G3
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Group Name: Natural Gas Dehydrators

Emissions Unit ID:	P002
Company Equipment ID:	TEG DEHY #1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P003
Company Equipment ID:	TEG DEHY #2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Group Name: Natural Gas Pipeline Heaters

Emissions Unit ID:	B009
Company Equipment ID:	LINE HEATER #2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	B010
Company Equipment ID:	LINE HEATER #1
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: P0105232

Facility ID: 1652000021

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 Akron Regional Air Quality Management District 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: P0105232

Facility ID: 1652000021

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: P0105232

Facility ID: 1652000021

Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0105232

Facility ID: 1652000021

Effective Date: To be entered upon final issuance

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.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0105232

Facility ID: 1652000021

Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. **B014, RECIP ENGINE/GENERATOR #101G3**

Operations, Property and/or Equipment Description:

Natural gas-fired, stationary, small internal combustion engine (229 BHP rated power output, 1.9 mmBtu/hr maximum rated heat input, 4-cycle/rich-burn) driving an emergency electrical generator. Potential uncontrolled and unrestricted emissions of volatile organic compounds (VOC), nitrogen oxides (NOx), and carbon monoxide (CO), based upon application data, are respectively 0.55 ton per year, 20.96 tons per year, and 77.33 tons per year. All hazardous air pollutants (HAP) are VOC. This renewal permit replaces Permit to Install (PTI) 16-02040 issued June 14, 2000. Per the application, this emissions unit has not been modified since its initial installation in January 2001.

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)	<p>The permittee shall burn only natural gas in this emissions unit.</p> <p>Visible particulate emissions (PE) from the stack serving this emissions unit shall not exceed 10% opacity, as a six-minute average.</p> <p>Nitrogen oxides (NOx) emissions shall not exceed 4.79 pounds per hour and 20.96 tons per year.</p> <p>Carbon monoxide (CO) emissions shall not exceed 17.66 pounds per hour and</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		77.33 tons per year. The requirements of OAC rule 3745-31-05(A)(3) also include compliance with the requirements of OAC rules 3745-17-11(B)(5)(a) and 3745-18-06(A), and 40 CFR 63 Subpart ZZZZ.
b.	OAC rule 3745-17-11(B)(5)(a)	PE shall not exceed 0.310 pound per million Btu of actual heat input for a stationary small internal combustion engine.
c.	OAC rule 3745-17-07(A)	The visible PE limitation from OAC rule 3745-17-07(A) is less stringent than the visible particulate emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).
d.	OAC rule 3745-18-06(A)	Pursuant to OAC rule 3745-18-06(A), this emissions unit is exempt from OAC rule 3745-18-06(G) during any calendar day in which natural gas is the only fuel burned.
e.	40 CFR 63 Subpart ZZZZ	Emissions unit B014 is an existing emergency spark ignition 4 stroke rich burn (4SRB) stationary RICE located at an area source, so per 63.6590(b)(3) it does not have to meet the requirements of 40 CFR 63 Subpart ZZZZ or Subpart A. No initial notification is necessary.

(2) Additional Terms and Conditions

- a. The NOx and CO emission limitations established pursuant to OAC rule 3745-31-05(A)(3) reflect the potentials to emit for this emissions unit. In addition, the PE limit from OAC rule 3745-17-11(B)(5)(a) is greater than the potential to emit for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure ongoing compliance with the NOx, CO, and PE emission limitations.

However, the permittee shall apply for and, if required, obtain a modification to this permit or obtain a new final permit-to-install and operate (PTIO) prior to making any change to equipment or change in the method of operation of this emissions unit that results in an increase in the allowable emissions or results in an increase in emissions of greater than the de minimis levels in OAC rule 3745-15-05 for any type of air contaminant not previously emitted.

- b. The synthetic minor Title V (SMTV) strategy employed by Wellington Compressor Station to limit potential facility emissions below applicable Title V program thresholds requires federally enforceable emissions control for the two glycol natural gas dehydrators (Emissions Units P002 and P003), but does not



include any such requirements for the two natural gas pipeline heaters (Emissions Units B009 and B010) and the emergency electrical generator (Emissions Unit B014). Emissions Units B009, B010, and B014 may operate unrestricted and uncontrolled while maintaining the SMTV status of this facility.

c) Operational Restrictions

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

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.

e) Reporting Requirements

- (1) 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.
- (2) The permittee shall identify unit in the annual PER each day when a fuel other than natural gas was burned in this emissions.

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 Limitation:

Visible PE from the stack serving this emissions unit shall not exceed 10% opacity as a six-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

b. Emission Limitation:

PE shall not exceed 0.310 pound per million Btu of actual heat input for a stationary small internal combustion engine.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with the requirements in 40 CFR Part 60, Appendix A, Methods 1 - 5 and the procedures specified in OAC rule 3745-17-03(B)(10).



c. Emission Limitations:

NOx emissions shall not exceed 4.79 pounds per hour and 20.96 tons per year.

Applicable Compliance Method:

If required, compliance with the hourly limitation shall be determined in accordance with the requirements in 40 CFR Part 60, Appendix A, Methods 1 – 4 and 7E.

The annual limitation was established by multiplying the hourly limitation by 8760 and then dividing by 2000. Therefore, as long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be assumed.

d. Emission Limitation:

CO emissions shall not exceed 17.66 pounds per hour and 77.33 tons per year.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with the requirements in 40 CFR Part 60, Appendix A, Methods 1 – 4 and 10.

The annual limitation was established by multiplying the hourly limitation by 8760 and then dividing by 2000. Therefore, as long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be assumed.

g) Miscellaneous Requirements

- (1) None.



2. Emissions Unit Group - Natural Gas Dehydrators: P002, P003,

EU ID	Operations, Property and/or Equipment Description
P002	Glycol natural gas dehydrator No. 1 (absorber tower & regenerator still w/ 0.6 mmBtu/hr natural gas-fired re-boiler, air emissions of organic compounds (OC) vented to and controlled by a 2.3 mmBtu/hr natural gas-assisted flare common to P003, particulate emissions (PE) uncontrolled and unrestricted.) Unrestricted and uncontrolled potential emissions of volatile organic compounds (VOC), total hazardous air pollutants (HAP), nitrogen oxides (NOx), and carbon monoxide (CO), based upon application data, are respectively 58.0 tons per year, 41.0 tons per year, 0.61 ton per year, and 2.09 tons per year. All OC are VOC; therefore, the VOC emissions rate is equal to the OC emissions rate. All hazardous air pollutants (HAP) are VOC. This renewal permit replaces Permit to Install (PTI) 16-01627 issued January 23, 1997. Per the application, this emissions unit has not been modified since its initial installation in January 1982.
P003	Glycol natural gas dehydrator No. 2 (absorber tower & regenerator still w/ 0.6 mmBtu/hr natural gas-fired re-boiler, air emissions of organic compounds (OC) vented to and controlled by a 2.3 mmBtu/hr natural gas-assisted flare common to P002, particulate emissions (PE) uncontrolled and unrestricted.) Unrestricted and uncontrolled potential emissions of volatile organic compounds (VOC), total hazardous air pollutants (HAP), nitrogen oxides (NOx), and carbon monoxide (CO), based upon application data, are respectively 80.5 tons per year, 58.0 tons per year, 0.61 ton per year, and 2.09 tons per year. All OC are VOC; therefore, the VOC emissions rate is equal to the OC emissions rate. All hazardous air pollutants (HAP) are VOC. This renewal permit replaces Permit to Install (PTI) 16-01627 issued January 23, 1997. Per the application, this emissions unit has not been modified since its initial installation in January 1982.

- 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)	OC emissions from emissions units P002



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>and P003, combined, shall not exceed 1.00 pound per hour.[See b)(2)a.]</p> <p>The permittee shall burn only natural gas in emissions units P002 and P003.</p> <p>The requirements of OAC rule 3745-31-05(A)(3) also include compliance with the provisions of OAC rules 3745-17-07(A), 3745-17-10(B)(1), 3745-17-11(B), 3745-18-06(A), 3745-21-07(G), 3745-31-05(D), ORC 3704.03(F)(3)(c)/F(4) & OAC rule 3745-114-01, and 40 CFR 60.18.</p>
b.	OAC rule 3745-17-07(A)	Visible PE from each stack serving these emissions units shall not exceed 20% opacity as a six-minute average, except as provided by rule.
c.	OAC rule 3745-17-10(B)(1) (applies to the re-boiler burner)	PE shall not exceed 0.020 pound per million Btu of actual heat input from each re-boiler stack serving these emissions units.
d.	OAC rule 3745-17-11(B) (applies to the flare)	PE shall not exceed 0.551 pound per hour from the flare stack serving these emissions units. Appendix Figure II is not applicable because the uncontrolled mass rate of emission is less than 10 pounds per hour.
e.	OAC rule 3745-18-06(A)	Pursuant to OAC rule 3745-18-06(A), this emissions unit is exempt from OAC rule 3745-18-06(G) during any calendar day in which natural gas is the only fuel burned.
f.	OAC rule 3745-21-07(G)	Exempt from the requirements of OAC rule 3745-21-07(G)(2) in accordance with OAC rule 3745-21-07(G)(9). The dehydrator is designed to use only triethylene glycol, which is not a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5).
g.	OAC rule 3745-31-05(D)	<p>The emissions of OC from emissions units P002 and P003, combined, shall not exceed 4.38 tons per year, based upon a rolling, 12-month summation of the monthly OC emissions.</p> <p>In order to maintain this facility as a synthetic minor Title V (SMTV) source of VOC and HAP emissions, the permittee shall continuously employ and maintain a</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		flare, which satisfies all of the applicable design/operating parameter specifications of 40 CFR 60.18 and other requirements of this permit, and an emissions capture (collection) system and any other equipment necessary, in accordance with the manufacturer's recommendations, instructions, and operating manual(s), that complies with the hourly OC emissions limitation for emissions units P002 and P003, combined, established pursuant to OAC rule 3745-31-05(A)(3).
h.	ORC 3704.03(F)(3)(c) and F(4) OAC rule 3745-114-01	See g)(1).
i.	40 CFR 63.1274(d)(2)	Emissions units P002 and P003 are exempt from the control, monitoring, record keeping, and reporting requirements of paragraph (c) of § 63.1274 General Standards of Subpart HHH—National Emission Standards for Hazardous Air Pollutants From Natural Gas Transmission and Storage Facilities because the actual average emissions of benzene from the glycol dehydration unit process vents to the atmosphere, after 98% destruction by the federally enforceable emissions control in place, i.e., the flare serving emissions units P002 and P003, are less than 0.90 megagram per year as determined by the procedures specified in §63.1282(a)(2) of this subpart.

(2) Additional Terms and Conditions

- a. The PE limits from OAC rules 3745-17-10(B)(1) and 3745-17-11(B) are greater than the potential to emit for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure ongoing compliance with the PE emissions limits.

However, the permittee shall apply for and, if required, obtain a modification to this permit or obtain a new final permit-to-install and operate (PTIO) prior to making any change to equipment or change in the method of operation of this emissions unit that results in an increase in the allowable emissions or results in an increase in emissions of greater than the de minimis levels in OAC rule 3745-15-05 for any type of air contaminant not previously emitted..



- b. The synthetic minor Title V (SMTV) strategy employed by Wellington Compressor Station to limit potential facility emissions below applicable Title V program thresholds requires federally enforceable emissions control for the two glycol natural gas dehydrators (Emissions Units P002 and P003), but does not include any such requirements for the two natural gas pipeline heaters (Emissions Units B009 and B010) and the emergency electrical generator (Emissions Unit B014). Emissions Units B009, B010, and B014 may operate unrestricted and uncontrolled while maintaining the SMTV status of this facility.
 - c. On February 18, 2008, Ohio EPA rescinded existing rule 3745-21-07 of the Ohio Administrative Code (OAC) and adopted new rule 3745-21-07. The new OAC rule 3745-21-07 does not establish any requirements for this emissions unit. The rule rescindment and new rule shall be federally enforceable on the date the U.S. EPA approves a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the rule rescindment and new OAC rule 3745-21-07, the requirement to comply with OAC rule 3745-21-07(G)(2) still exists as part of the federally-approved SIP of Ohio. It should be noted that the requirements to comply with OAC rule 3745-21-07(G)(2) shall terminate on the date the U.S. EPA approves the rule rescindment and new rule as a revision of the Ohio SIP.
 - d. All OCs are assumed to be VOCs and all HAPs are assumed to be VOCs.
- c) Operational Restrictions
- (1) The permittee shall only use tri-ethylene glycol as the dehydration material in emissions units P002 and P003.
 - (2) All collected gas from emissions units P002 and P003 shall be vented to a flare designed and operated, as follows:
 - a. The flare shall be fired with natural gas and shall be operated with a 98% OC destruction efficiency.
 - b. The flare shall be designed and operated in a manner that will ensure no visible emissions, as determined by 40 CFR 60.18(f), except for periods not to exceed a total of 5 minutes during any 2 consecutive hours.
 - c. The flare shall be operated at all times when emissions may be vented to it, as determined by methods specified in 40 CFR 60.18(f).
 - d. The flare shall be used only when the net heating value of the gas being combusted is 200 Btu/scf or greater. The net heating value of the gas being combusted shall be determined by the methods specified in 40 CFR 60.18(f).
 - e. The flare shall be designed for and operated with an exit velocity that satisfies the specifications of 40 CFR 60.18.
 - f. A pilot flame shall be maintained at all times in the flare's pilot light burner.
 - g. The device to continuously monitor the flare for the presence of a pilot flame shall be in operation when the emissions unit is in operation.



h. The flare shall be in operation when the emissions unit is in operation.

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 emissions units P002 and/or P003.
- (2) The permittee shall perform bi-weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stacks (re-boiler and flare) serving these emissions units. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the visible emission check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

- (3) For each day during which the permittee uses a dehydration material other than triethylene glycol, the permittee shall maintain a record of the type and quantity of the material used in emissions units P002 and/or P003.
- (4) The permittee shall calculate and maintain monthly records of the OC emissions and the rolling, 12-month summation of the OC emissions from emissions units P002 and P003, combined.
- (5) The permittee shall properly install, operate, and maintain a thermocouple or any other equivalent device to continuously monitor the flare for the presence of a 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.
- (6) The permittee shall monitor the flare to ensure that it is operated and maintained in conformance with its design and the requirements contained in this permit. The net



heating value of a gas, the actual exit velocity for the flare, and the maximum permitted velocity for an air-assisted flare shall be determined as specified by 40 CFR 60.18.

- (7) The permittee shall record the following information each day for the flare and process operations:
 - a. all periods during which there was no pilot flame; and
 - b. the operating times for the flare, monitoring equipment, and emissions units P002 and P003.
- e) Reporting Requirements
 - (1) 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.
 - (2) The permittee shall identify the following information in the annual PER:
 - a. all days during which any visible particulate emissions were observed from the stacks serving these emissions units;
 - b. any corrective actions taken to eliminate the visible particulate emissions;
 - c. each day when a fuel other than natural gas was burned in this emissions unit; and
 - d. each day when a dehydration material other than tri-ethylene glycol was used in emissions unit P002 and/or P003.
 - e. each time a pilot flame was not functioning properly in the flare's pilot light burner.
 - f. each time the flare was not in operation and the emissions unit was operating.
 - (3) 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. The rolling, 12-month month OC emission limitation of 4.38 tons (for emissions units P002 and P003, combined).
 - ii. The OC destruction efficiency of 98%, by weight, for the flare.
 - 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 date, time, 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, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

f) Testing Requirements

- (1) Compliance with the emission limitations in sections b)(1) and b)(2) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Visible PE from each stack serving these emissions units shall not exceed 20% opacity, as a six-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

b. Emission Limitation:

The flare shall be designed and operated in a manner that will ensure no visible emissions, as determined by 40 CFR 60.18(f), except for periods not to exceed a total of 5 minutes during any 2 consecutive hours.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 22, and the procedures specified in 40 CFR Part 60.18(f).

c. Emission Limitation:

PE shall not exceed 0.020 pound per million Btu of actual heat input from each re-boiler stack serving these emissions units.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with the requirements in 40 CFR Part 60, Appendix A, Method 5 and the procedures specified in OAC rule 3745-17-03(B)(9).



d. Emission Limitation:

PE shall not exceed 0.551 pound per hour from the flare stack serving these emissions units.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with the requirements in 40 CFR Part 60, Appendix A, Methods 1 - 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

e. Emission Limitation:

OC emissions from emissions units P002 and P003, combined, shall not exceed 1.00 pound per hour.

Applicable Compliance Method:

If required, compliance shall be determined by employing the Gas Research Institute's simulation program GLYCalc version 3 or equivalent, wet gas analyses of the gases from the Wellington and Lorain storage fields, AP-42 emission factors for products of combustion, and an assumed destruction efficiency of 98% for the flare.

f. Emission Limitation:

The flare shall be operated with 98% control efficiency.

Applicable Compliance Method:

If the flare complies with the control requirements specified in Section b)(2)(d) above, compliance with the 98% control efficiency requirement will be assumed.

g. Emission Limitation:

The emissions of OC from emissions units P002 and P003, combined, shall not exceed 4.38 tons per year, based upon a rolling, 12-month summation of the monthly OC emissions.

Applicable Compliance Method:

Compliance shall be determined from the record keeping requirements of d)(4) above.

g) Miscellaneous Requirements

- (1) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified federally enforceable permit-to-install and operate (FEPTIO)



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0105232

Facility ID: 1652000021

Effective Date: To be entered upon final issuance

prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new FEPTIO.



3. Emissions Unit Group - Natural Gas Pipeline Heaters: B009, B010,

EU ID Operations, Property and/or Equipment Description

B009 Natural gas pipeline heater No. 2 (natural gas-fired, indirect heating, rated at 12 mmBtu/hr, particulate emissions (PE) uncontrolled and unrestricted.) Potential uncontrolled and unrestricted emissions of volatile organic compounds (VOC), nitrogen oxides (NOx), and carbon monoxide (CO), based upon application data, are respectively 0.28 ton per year, 5.15 tons per year, and 4.33 tons per year. All hazardous air pollutants (HAP) are VOC. This renewal permit replaces Permit to Install (PTI) 16-00196 issued October 7, 1982. Per the application, this emissions unit has not been modified since its initial installation in January 1982.

B010 Natural gas pipeline heater No. 1 (natural gas-fired, indirect heating, rated at 14 mmBtu/hr, particulate emissions (PE) uncontrolled and unrestricted.) Potential uncontrolled and unrestricted emissions of volatile organic compounds (VOC), nitrogen oxides (NOx), and carbon monoxide (CO), based upon application data, are respectively 0.33 ton per year, 6.01 tons per year, and 5.05 tons per year. All hazardous air pollutants (HAP) are VOC. This renewal permit replaces Permit to Install (PTI) 16-00196 issued October 7, 1982. Per the application, this emissions unit has not been modified since its initial installation in January 1982.

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)	The requirements established pursuant to this rule are equivalent to the requirements of OAC rules 3745-17-07(A), 3745-17-10(B)(1), and 3745-18-06(A).
b.	OAC rule 3745-17-07(A)	Visible PE from each stack serving these



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		emissions units shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
c.	OAC rule 3745-17-10(B)(1)	PE shall not exceed 0.020 pound per million Btu of actual heat input from each of these emissions units.
d.	OAC rule 3745-18-06(A)	Pursuant to OAC rule 3745-18-06(A), this emissions unit is exempt from OAC rule 3745-18-06(G) during any calendar day in which natural gas is the only fuel burned.

(2) Additional Terms and Conditions

- a. The PE limit from OAC rule 3745-17-10(B)(1) is greater than the potential to emit for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure ongoing compliance with the PE emissions limit.

However, the permittee shall apply for and, if required, obtain a modification to this permit or obtain a new final permit-to-install and operate (PTIO) prior to making any change to equipment or change in the method of operation of this emissions unit that results in an increase in the allowable emissions or results in an increase in emissions of greater than the de minimis levels in OAC rule 3745-15-05 for any type of air contaminant not previously emitted.

- b. The synthetic minor Title V (SMTV) strategy employed by Wellington Compressor Station to limit potential facility emissions below applicable Title V program thresholds requires federally enforceable emissions control for the two glycol natural gas dehydrators (Emissions Units P002 and P003), but does not include any such requirements for the two natural gas pipeline heaters (Emissions Units B009 and B010) and the emergency electrical generator (Emissions Unit B014). Emissions Units B009, B010, and B014 may operate unrestricted and uncontrolled while maintaining the SMTV status of this facility.

c) Operational Restrictions

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

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.

e) Reporting Requirements

- (1) 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.

- (2) The permittee shall identify information in the annual PER each day when a fuel other than natural gas was burned in this emissions unit.

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 Limitation:

Visible PE from each stack serving these emissions units shall not exceed 20% opacity as a six-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

- b. Emission Limitation:

PE shall not exceed 0.020 pound per million Btu of actual heat input from each of these emissions units.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with the requirements in 40 CFR Part 60, Appendix A, Method 5 and the procedures specified in OAC rule 3745-17-03(B)(9).

g) Miscellaneous Requirements

- (1) None.