State of Ohio Environmental Protection Agency

Street Address:
1800 WaterMark Drive
Columbus, OH 43215-1099

TELE: (614) 644-3020 **FAX:** (614) 644-2329

Mailing Address:
P.O. Box 1049
Columbus, OH 43216-1049

08/13/98

CERTIFIED MAIL

RE: Final Title V Chapter 3745-77 permit

15-76-00-1799
East Ohio Gas - Robinson Station
Troy Hawkins
1201 E. 55th Street
Cleveland, OH 44103

Dear Troy Hawkins:

Enclosed is the Title V permit that allows you to operate the facility in the manner indicated in the permit. Because this permit may contain several conditions and restrictions, we urge you to read it carefully.

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street
Room 300
Columbus, Ohio 43215

If you have any questions, please contact Canton Division of Air Pollution Control.

Very truly yours,

Thomas G. Rigo

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: Canton Division of Air Pollution Control
Becky Castle, DAPC PMU

Ohio EPA
State of Ohio Environmental Protection Agency

TITLE V PERMIT

Issue Date: 08/13/98

FINAL ISSUANCE

Effective Date: 08/13/98

Expiration Date: 08/13/03

This document constitutes issuance to:

East Ohio Gas - Robinson Station
5433 West Blvd
Canton, OH 44718

of a Title V permit for Facility ID: 15-76-00-1799

Emissions Unit ID (Company ID)/
Emissions Unit Activity Description:
P001 (Engine #1, Unit 4801)
Cooper-Bessemer, 2-Cycle Lean Burn, Internal Combustion Engine, Model GMV10-T,
1350 HP rated power output, 11.5 MMBtu/hr rated heat input

P002 (Engine #2, Unit 4802)
Cooper-Bessemer, 2-Cycle Lean Burn, Internal Combustion Engine, Model GMV10-T,
1350 HP rated power output, 11.5 MMBtu/hr rated heat input

P003 (Engine #3, Unit 4803)
Cooper-Bessemer, 2-Cycle Lean Burn, Internal Combustion Engine, Model GMV10-T,
1350 HP rated power output, 11.5 MMBtu/hr rated heat input

P004 (Engine #4, Unit 4804)
Cooper-Bessemer, 2-Cycle Lean Burn, Internal Combustion Engine, Model GMV10-T,
1350 HP rated power output, 11.5 MMBtu/hr rated heat input

P005 (Turbine #1, Unit 4805)
Solar Centaur Gas Turbine, Model T3002R, 3730 HP rated power output,
29.0 MMBtu/hr rated heat input

P006 (Turbine #2, Unit 4806)
Solar Centaur Gas Turbine, Model T4002, 3830 HP rated power output,
36.8 MMBtu/hr rated heat input

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. 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. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-04(A) and in accordance with the terms of this permit

beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

Canton Division of Air Pollution Control
420 Market Avnue N.
Canton, OH 44702-1544
(216) 489-3385

OHIO ENVIRONMENTAL PROTECTION AGENCY

_____

Director

PART I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Section

1. Monitoring and Related Recordkeeping and Reporting Requirements

a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

   i. The date, place (as defined in the permit), and time of sampling or measurements.
   ii. The date(s) analyses were performed.
   iii. The company or entity that performed the analyses.
   iv. The analytical techniques or methods used.
   v. The results of such analyses.
   vi. The operating conditions existing at the time of sampling or measurement.

b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

   i. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
   ii. Quarterly written reports of (i) any deviations from federally enforceable <u>emission limitations</u>, <u>operational restrictions</u>, <u>and control device operating parameter limitations</u>, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. These quarterly written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations except malfunctions, which shall be reported in accordance with OAC rule 3745-15-06. The written reports shall be submitted quarterly, i.e., 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.) See B.8 below if no deviations occurred during the quarter.
   iii. Written reports, which identify any deviations from the federally enforceable <u>monitoring</u>, <u>recordkeeping</u>, <u>and reporting requirements</u> contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the reporting of any deviations related to the monitoring, recordkeeping, and reporting requirements. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports submitted pursuant to OAC rule 3745-15-06 shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of deviations caused by malfunctions or upsets.

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

3. Risk Management Plans

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

4. 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.

5. 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.

6. 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. 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.

7. 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.

8. 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.

9. 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 general terms and conditions shall apply to all operating scenarios authorized in this permit.

10. 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 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.

11. 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.

12. 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:

i. 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.
ii. 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.
iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
iv. 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:

i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
ii. 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 appropriate Ohio EPA District Office or local air agency in the following manner and with the following content:

i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.

ii. 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.

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

13. 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.

14. 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).

15. 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.

16. 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, except that no such notice shall be required for changes that qualify as insignificant emission 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; and

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.

(For further clarification, the permittee can refer to Engineering Guide #63 that is available in their STARSHIP software package.)

17. **Compliance Method Requirements**

No term or condition specifying a method for demonstrating compliance with any emission limitation or other requirement of this permit shall preclude the use by any person of any credible evidence to establish compliance with or a violation of this permit, the Clean Air Act, or any implementing regulations or rules promulgated thereunder.

B. State Only Enforceable Section

1. 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.

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping 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 (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., 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.)

3. Records Retention Requirements

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.

4. 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.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction 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).

6. 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.

7. 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.

8. Additional Reporting Requirements When There Are No Deviations of <u>Federally Enforceable</u> Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforcable Section

1. None

B. State Only Enforceable Section

1. The following insignificant emissions units are located at this facility:

Z007 No. Pipeline Heater
Z008 So. Pipeline Heater
Z009 Auxiliary Generator #1 *
Z010 Auxiliary Generator #2 *
Z011 Boiler #1
Z012 Aux. Water Pump #1
Z013 Air Compressor #1
Z014 Tank #96
Z015 Tank #97
Z016 Tank #98
Z017 Tank #99
Z018 Tank #100
Z019 Tank #101
Z020 Tank #102
Z021 Tank #103
Z022 Tank #104
Z023 Tank #105
Z024 Transition Vents
Z025 Facility-wide fugitive emissions

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within a Permit to Install for the emissions unit.

* The OAC 3745-31-03 (A) (4) permit-by-rule exemption applies provided that monthly records are kept to show the amount of natural gas used and each emergency generator operates no more than 500 hours per rolling 12-month period.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Engine #1, Unit 4801 (P001)

Activity Description: Cooper-Bessemer, 2-Cycle Lean Burn, Internal Combustion Engine, Model GMV10-T, 1350 HP rated power output, 11.5 MMBtu/hr rated heat input

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
11.5 MMBtu/hr, Natural Gas ("NG") Fired, Internal Combustion ("IC") Engine # 1, 2-cycle lean burn, which drives a compressor unit 4801 for natural gas underground storage	OAC 3745-17, including but not limited to 3745-17-11 (B)(5)(b)	0.35 lb PM/MMBtu actual heat input
	OAC 3745-17, including but not limited to 3745-17-07 (A)(1)	Visible emissions limits (see Additional Terms and Conditions 2.a)

2. Additional Terms and Conditions

2.a Visible particulate emissions from this emissions unit's stack shall not exceed twenty percent opacity, as a six-minute average, except that visible particulate emissions from this emissions unit's stack may exceed twenty percent opacity, as a six-minute average, for not more than six consecutive minutes in any sixty minutes, but shall not exceed sixty percent opacity, as a six-minute average, at any time.

II. Operational Restrictions

1. This emissions unit shall only operate using NG.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform monthly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. 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 eliminate the visible emissions.

IV. Reporting Requirements

1. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

1.a Emission Limitation: 0.35 lb particulate matter per million Btu of actual heat input.

Applicable Compliance Method: AP-42, 5th Edition emission factor, table 3.2-4 (.029 pound particulate matter per million Btu of actual heat input).

1.b Emission Limitation: Visible particulate emission limitations for stack emissions:
(1) Except as otherwise specified in (2), visible particulate emissions from any stack shall not exceed twenty per cent opacity, as a six-minute average.
(2) Visible particulate emissions from any stack may exceed twenty per cent opacity, as a six-minute average, for not more than six consecutive minutes in any sixty minutes, but shall not exceed sixty percent opacity, as a six-minute average, at any time.

Applicable Compliance Method: OAC rule 3745-17-03(B)(1).

VI. Miscellaneous Requirements

1. None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
11.5 MMBtu/hr, Natural Gas ("NG") Fired, Internal Combustion ("IC") Engine # 1, 2-cycle lean burn, which drives a compressor unit 4801 for natural gas underground storage	OAC 3745-18-06(G)	0.5 lb SO2/MMBtu actual heat input

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall monitor and record the natural gas heat content (in Btu/SCF) and sulfur content (in lbs/MMSCF) at the beginning of NG storage season each year.

IV. Reporting Requirements

1. The permittee shall report any instance of the natural gas heat content falling below 950 Btu/SCF or the sulfur content exceeding 0.5 lb/MMSCF.

V. Testing Requirements

1. Compliance with the emission limitation in section B.I.1 shall be verified pursuant to OAC rule 3745-18-04(F)(3) or (4). The sulfur dioxide emission rate shall be considered to be equal to 0.0 lb/MMBtu provided the heat content and the sulfur content of the NG remain above 950 Btu/SCF and below 0.5 lb/MMSCF respectively. If the heat content or sulfur content exceeds these limits, SO2 emissions in lb/MMBtu shall be calculated from the actual sulfur content of the NG.

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Engine #2, Unit 4802 (P002)

Activity Description: Cooper-Bessemer, 2-Cycle Lean Burn, Internal Combustion Engine, Model GMV10-T, 1350 HP rated power output, 11.5 MMBtu/hr rated heat input

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
11.5 MMBtu/hr, Natural Gas ("NG") Fired, Internal Combustion ("IC") Engine # 2, 2-cycle lean burn, which drives a compressor unit 4802 for natural gas underground storage	OAC 3745-17, including but not limited to 3745-17-11 (B)(5)(b)	0.35 lb PM/MMBtu actual heat input
	OAC 3745-17, including but not limited to 3745-17-07 (A)(1)	Visible emissions limits (see Additional Terms and Conditions 2.a)

2. Additional Terms and Conditions

2.a Visible particulate emissions from this emissions unit's stack shall not exceed twenty percent opacity, as a six-minute average, except that visible particulate emissions from this emissions unit's stack may exceed twenty percent opacity, as a six-minute average, for not more than six consecutive minutes in any sixty minutes, but shall not exceed sixty percent opacity, as a six-minute average, at any time.

II. Operational Restrictions

1. This emissions unit shall only operate using NG.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform monthly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. 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 eliminate the visible emissions.

IV. Reporting Requirements

1. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

1.a Emission Limitation: 0.35 lb particulate matter per million Btu of actual heat input.

Applicable Compliance Method: AP-42, 5th Edition emission factor, table 3.2-4 (.029 pound particulate matter per million Btu of actual heat input).

1.b Emission Limitation: Visible particulate emission limitations for stack emissions:
(1) Except as otherwise specified in (2), visible particulate emissions from any stack shall not exceed twenty per cent opacity, as a six-minute average.
(2) Visible particulate emissions from any stack may exceed twenty per cent opacity, as a six-minute average, for not more than six consecutive minutes in any sixty minutes, but shall not exceed sixty percent opacity, as a six-minute average, at any time.

Applicable Compliance Method: OAC rule 3745-17-03(B)(1).

VI. Miscellaneous Requirements

1. None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
11.5 MMBtu/hr, Natural Gas ("NG") Fired, Internal Combustion ("IC") Engine # 2, 2-cycle lean burn, which drives a compressor unit 4802 for natural gas underground storage	OAC 3745-18-06(G)	0.5 lb SO2/MMBtu actual heat input

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall monitor and record the natural gas heat content (in Btu/SCF) and sulfur content (in lbs/MMSCF) at the beginning of NG storage season each year.

IV. Reporting Requirements

1. The permittee shall report any instance of the natural gas heat content falling below 950 Btu/SCF or the sulfur content exceeding 0.5 lb/MMSCF.

V. Testing Requirements

1. Compliance with the emission limitation in section B.I.1 shall be verified pursuant to OAC rule 3745-18-04(F)(3) or (4). The sulfur dioxide emission rate shall be considered to be equal to 0.0 lb/MMBtu provided the heat content and the sulfur content of the NG remain above 950 Btu/SCF and below 0.5 lb/MMSCF respectively. If the heat content or sulfur content exceeds these limits, SO2 emissions in lb/MMBtu shall be calculated from the actual sulfur content of the NG.

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Engine #3, Unit 4803 (P003)

Activity Description: Cooper-Bessemer, 2-Cycle Lean Burn, Internal Combustion Engine, Model GMV10-T, 1350 HP rated power output, 11.5 MMBtu/hr rated heat input

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
11.5 MMBtu/hr, Natural Gas ("NG") Fired, Internal Combustion ("IC") Engine # 3, 2-cycle lean burn, which drives a compressor unit 4803 for natural gas underground storage	OAC 3745-17, including but not limited to 3745-17-11 (B)(5)(b)	0.35 lb PM/MMBtu actual heat input
	OAC 3745-17, including but not limited to 3745-17-07 (A)(1)	Visible emissions limits (see Additional Terms and Conditions 2.a)

2. Additional Terms and Conditions

2.a Visible particulate emissions from this emissions unit's stack shall not exceed twenty percent opacity, as a six-minute average, except that visible particulate emissions from this emissions unit's stack may exceed twenty percent opacity, as a six-minute average, for not more than six consecutive minutes in any sixty minutes, but shall not exceed sixty percent opacity, as a six-minute average, at any time.

II. Operational Restrictions

1. This emissions unit shall only operate using NG.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform monthly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. 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 eliminate the visible emissions.

IV. Reporting Requirements

1. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

1.a Emission Limitation: 0.35 lb particulate matter per million Btu of actual heat input.

Applicable Compliance Method: AP-42, 5th Edition emission factor, table 3.2-4 (.029 pound particulate matter per million Btu of actual heat input).

1.b Emission Limitation: Visible particulate emission limitations for stack emissions:
(1) Except as otherwise specified in (2), visible particulate emissions from any stack shall not exceed twenty per cent opacity, as a six-minute average.
(2) Visible particulate emissions from any stack may exceed twenty per cent opacity, as a six-minute average, for not more than six consecutive minutes in any sixty minutes, but shall not exceed sixty percent opacity, as a six-minute average, at any time.

Applicable Compliance Method: OAC rule 3745-17-03(B)(1).

VI. Miscellaneous Requirements

1. None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
11.5 MMBtu/hr, Natural Gas ("NG") Fired, Internal Combustion ("IC") Engine # 3, 2-cycle lean burn, which drives a compressor unit 4803 for natural gas underground storage	OAC 3745-18-06(G)	0.5 lb SO2/MMBtu actual heat input

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall monitor and record the natural gas heat content (in Btu/SCF) and sulfur content (in lbs/MMSCF) at the beginning of NG storage season each year.

IV. Reporting Requirements

1. The permittee shall report any instance of the natural gas heat content falling below 950 Btu/SCF or the sulfur content exceeding 0.5 lb/MMSCF.

V. Testing Requirements

1. Compliance with the emission limitation in section B.I.1 shall be verified pursuant to OAC rule 3745-18-04(F)(3) or (4). The sulfur dioxide emission rate shall be considered to be equal to 0.0 lb/MMBtu provided the heat content and the sulfur content of the NG remain above 950 Btu/SCF and below 0.5 lb/MMSCF respectively. If the heat content or sulfur content exceeds these limits, SO2 emissions in lb/MMBtu shall be calculated from the actual sulfur content of the NG.

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Engine #4, Unit 4804 (P004)

Activity Description: Cooper-Bessemer, 2-Cycle Lean Burn, Internal Combustion Engine, Model GMV10-T, 1350 HP rated power output, 11.5 MMBtu/hr rated heat input

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
11.5 MMBtu/hr, Natural Gas ("NG") Fired, Internal Combustion ("IC") Engine # 4, 2-cycle lean burn, which drives a compressor unit 4804 for natural gas underground storage	OAC 3745-17, including but not limited to 3745-17-11 (B)(5)(b)	0.35 lb PM/MMBtu actual heat input
	OAC 3745-17, including but not limited to 3745-17-07 (A)(1)	Visible emissions limits (see Additional Terms and Conditions 2.a)

2. Additional Terms and Conditions

2.a Visible particulate emissions from this emissions unit's stack shall not exceed twenty percent opacity, as a six-minute average, except that visible particulate emissions from this emissions unit's stack may exceed twenty percent opacity, as a six-minute average, for not more than six consecutive minutes in any sixty minutes, but shall not exceed sixty percent opacity, as a six-minute average, at any time.

II. Operational Restrictions

1. This emissions unit shall only operate using NG.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform monthly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. 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 eliminate the visible emissions.

IV. Reporting Requirements

1. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

1.a Emission Limitation: 0.35 lb particulate matter per million Btu of actual heat input.

Applicable Compliance Method: AP-42, 5th Edition emission factor, table 3.2-4 (.029 pound particulate matter per million Btu of actual heat input).

1.b Emission Limitation: Visible particulate emission limitations for stack emissions:
(1) Except as otherwise specified in (2), visible particulate emissions from any stack shall not exceed twenty per cent opacity, as a six-minute average.
(2) Visible particulate emissions from any stack may exceed twenty per cent opacity, as a six-minute average, for not more than six consecutive minutes in any sixty minutes, but shall not exceed sixty percent opacity, as a six-minute average, at any time.

Applicable Compliance Method: OAC rule 3745-17-03(B)(1).

VI. Miscellaneous Requirements

1. None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
11.5 MMBtu/hr, Natural Gas ("NG") Fired, Internal Combustion ("IC") Engine # 4, 2-cycle lean burn, which drives a compressor unit 4804 for natural gas underground storage	OAC 3745-18-06(G)	0.5 lb SO2/MMBtu actual heat input

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall monitor and record the natural gas heat content (in Btu/SCF) and sulfur content (in lbs/MMSCF) at the beginning of NG storage season each year.

IV. Reporting Requirements

1. The permittee shall report any instance of the natural gas heat content falling below 950 Btu/SCF or the sulfur content exceeding 0.5 lb/MMSCF.

V. Testing Requirements

1. Compliance with the emission limitation in section B.I.1 shall be verified pursuant to OAC rule 3745-18-04(F)(3) or (4). The sulfur dioxide emission rate shall be considered to be equal to 0.0 lb/MMBtu provided the heat content and the sulfur content of the NG remain above 950 Btu/SCF and below 0.5 lb/MMSCF respectively. If the heat content or sulfur content exceeds these limits, SO2 emissions in lb/MMBtu shall be calculated from the actual sulfur content of the NG.

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Turbine #1, Unit 4805 (P005)

Activity Description: Solar Centaur Gas Turbine, Model T3002R, 3730 HP rated power output, 29.0 MMBtu/hr rated heat input

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
29.0 MMBtu/hr, Natural Gas ("NG") Fired, Turbine Engine # 1, which drives a compressor unit 4805 for natural gas underground storage	OAC 3745-17, including but not limited to 3745-17-11 (B)(4)	0.040 lb PM/MMBtu actual heat input
	OAC 3745-17, including but not limited to 3745-17-07 (A)(1)	Visible emissions limits (see Additional Terms and Conditions 2.a)

2. Additional Terms and Conditions

2.a Visible particulate emissions from this emissions unit's stack shall not exceed twenty percent opacity, as a six-minute average, except that visible particulate emissions from this emissions unit's stack may exceed twenty percent opacity, as a six-minute average, for not more than six consecutive minutes in any sixty minutes, but shall not exceed sixty percent opacity, as a six-minute average, at any time.

II. Operational Restrictions

1. This emissions unit shall only operate using NG.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform monthly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. 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 eliminate the visible emissions.

IV. Reporting Requirements

1. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

1.a Emission Limitation: 0.040 lb particulate matter per million Btu of actual heat input.

Applicable Compliance Method: EPA-454-95-012, August 1995, USEPA FIRE system, version 5.0, SCC 20300202 emission factor of 14 lbs PM/MMCF. (14 lbs PM/MMCF)/(1000 Btu/CF) = 0.014 lb PM/MMBtu

1.b Emission Limitation: Visible particulate emission limitations for stack emissions:
(1) Except as otherwise specified in (2), visible particulate emissions from any stack shall not exceed twenty per cent opacity, as a six-minute average.
(2) Visible particulate emissions from any stack may exceed twenty per cent opacity, as a six-minute average, for not more than six consecutive minutes in any sixty minutes, but shall not exceed sixty percent opacity, as a six-minute average, at any time.

Applicable Compliance Method: OAC rule 3745-17-03(B)(1).

VI. Miscellaneous Requirements

1. None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
29.0 MMBtu/hr, Natural Gas ("NG") Fired, Turbine Engine # 1, which drives a compressor unit 4805 for natural gas underground storage	OAC 3745-18-06(F)	0.5 lb SO2/MMBtu actual heat input

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall monitor and record the natural gas heat content (in Btu/SCF) and sulfur content (in lbs/MMSCF) at the beginning of NG storage season each year.

IV. Reporting Requirements

1. The permittee shall report any instance of the natural gas heat content falling below 950 Btu/SCF or the sulfur content exceeding 0.5 lb/MMSCF.

V. Testing Requirements

1. Compliance with the emission limitation in section B.I.1 shall be verified pursuant to OAC rule 3745-18-04(F)(3) or (4). The sulfur dioxide emission rate shall be considered to be equal to 0.0 lb/MMBtu provided the heat content and the sulfur content of the NG remain above 950 Btu/SCF and below 0.5 lb/MMSCF respectively. If the heat content or sulfur content exceeds these limits, SO2 emissions in lb/MMBtu shall be calculated from the actual sulfur content of the NG.

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Turbine #2, Unit 4806 (P006)

Activity Description: Solar Centaur Gas Turbine, Model T4002, 3830 HP rated power output, 36.8 MMBtu/hr rated heat input

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
36.8 MMBtu/hr, Natural Gas (NG) Fired, Turbine Engine # 2, which drives a compressor unit 4806 for natural gas underground storage	OAC 3745-17, including but not limited to 3745-17-11 (B)(4)	0.040 lb PM/MMBtu actual heat input
	OAC 3745-17, including but not limited to 3745-17-07 (A)(1)	Visible Emissions Limit (see Additional Terms and Conditions 2.a)

2. Additional Terms and Conditions

2.a Visible particulate emissions from this emissions unit's stack shall not exceed twenty percent opacity, as a six-minute average, except that visible particulate emissions from this emissions unit's stack may exceed twenty percent opacity, as a six-minute average, for not more than six consecutive minutes in any sixty minutes, but shall not exceed sixty percent opacity, as a six-minute average, at any time.

II. Operational Restrictions

1. This emissions unit shall only operate on NG.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform monthly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. 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 eliminate the visible emissions.

IV. Reporting Requirements

1. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

1.a Emission Limitation: 0.040 lb particulate matter per million Btu of actual heat input.

Applicable Compliance Method: EPA-454-95-012, August 1995, USEPA FIRE system, version 5.0, SCC 20300202 emission factor of 14 lbs PM/MMCF. (14 lbs PM/MMCF)/(1000 Btu/CF) = 0.014 lb PM/MMBtu

1.b Emission Limitation: Visible particulate emission limitations for stack emissions:
(1) Except as otherwise specified in (2), visible particulate emissions from any stack shall not exceed twenty per cent opacity, as a six-minute average.
(2) Visible particulate emissions from any stack may exceed twenty per cent opacity, as a six-minute average, for not more than six consecutive minutes in any sixty minutes, but shall not exceed sixty percent opacity, as a six-minute average, at any time.

Applicable Compliance Method: OAC rule 3745-17-03(B)(1).

VI. Miscellaneous Requirements

1. None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
36.8 MMBtu/hr, Natural Gas ("NG") Fired, Turbine Engine # 2, which drives a compressor unit 4806 for natural gas underground storage	OAC 3745-31-05 See B.VI.	4.94 tons PM/yr 21.11 lbs NOx/hr 71.19 tons NOx/yr 6.2 lbs CO/hr 20.85 tons CO/yr
	OAC 3745-18-06(F), See B.VI.	0.5 SO2/MMBtu actual heat input

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. This emissions unit shall only operate on natural gas (NG) and within the manufacturer's specifications.

2. The maximum natural gas usage for this emissions unit shall not exceed 248 MMCF/yr, based upon rolling 12-month summations of the MMCF of natural gas used.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records and rolling 12-month summations of the amount of natural gas (in MMCF NG) used in this emissions unit.

2. The permittee shall monitor and record the natural gas heat content (in Btu/SCF) and sulfur content (in lbs/MMSCF) at the beginning of NG storage season each year.

IV. Reporting Requirements

1. The permittee shall submit annual reports to the Canton City Health Department, Air Pollution Control Division, which contain the amount of natural gas used (in MMCF) by month and year in each emissions unit. These reports shall be submitted by February 15 of each year.

2. The permittee shall report any exceedance of the rolling 248 MMCF/yr of natural gas usage limit on this emissions unit.

3. The permittee shall report any instance of the natural gas heat content falling below 950 Btu/SCF or the sulfur content exceeding 0.5 lb/MMSCF.

V. Testing Requirements

1. Compliance with the emission limitations in Section B.I.1. of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitation-

4.94 tons PM/yr

Applicable Compliance Method-

Use the emissions factor from EPA-454-95-012 of August 1995, USEPA FIRE system, version 5.0, SCC code 20300202, of 14 lbs PM/MMCF, and multiply by the maximum fuel usage of 248 MMCF/yr and divide by 2,000 lbs/ton, yielding annual emissions of 1.73 tons PM.

b. Emissions Limitation-

21.11 lbs NOx/hr

Applicable Compliance Method-

Use the emissions factor from Alternative Control Techniques Document (NOx Emissions from Stationary Gas Turbines, EPA-453/R-93-007) of 0.521 lb NOx/MMBtu for a Solar Centaur, and multiply by the turbine rating of 36.8 MMBtu/hr yielding an emissions rate of 19.2 lbs NOx/hr.

c. Emissions Limitation-

71.19 tons NOx/yr

Applicable Compliance Method-

Use the emissions factor referenced above and multiply by the maximum fuel usage of 248 MMCF/yr and heat content of 1000 Btu/CF, and divide by 2000 lbs/ton, yielding an annual emissions rate of 64.60 tons NOx

d. Emissions Limitation-

6.2 lbs CO/hr

Applicable Compliance Method-

Use the emissions factor from AP-42, January 1995, Chapter 3, Table 3.2-2 of 0.17 lb CO/MMBtu and multiply by the turbine rating of 36.8 MMBtu/hr, yielding an emissions rate of 6.2 lbs CO/hr.

e. Emissions Limitation-

20.8 tons CO/yr

Applicable Compliance Method-

Use the emissions factor referenced above and multiply by the maximum fuel usage of 248 MMCF/yr and heat content of 1000 Btu/CF, and divide by 2000 lbs/ton, yilding an annual emissions rate of 20.8 tons CO.

2. Compliance with the emission limitation in section B.I.1 shall be verified pursuant to OAC rule 3745-18-04(F)(3) or (4). The sulfur dioxide emission rate shall be considered to be equal to 0.0 lb/MMBtu provided the heat content and the sulfur content of the NG remain above 950 Btu/SCF and below 0.5 lb/MMSCF respectively. If the heat content or sulfur content exceeds these limits, SO2 emissions in lb/MMBtu shall be calculated from the actual sulfur content of the NG.

VI. Miscellaneous Requirements

1. The following terms and conditions shall supercede all the air pollution control requirements for this emissions unit contained in the permit to install number 15-1187 as issued on March 19, 1997: B.I., B.II., B.III., B.IV. and B.V.

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