Ohio Environmental Protection Agency

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director

11/17/2010

Certified Mail

Facility ID: 0238000049
Permit Number: P0106460
County: Holmes

Jeff McCombs
HOLMES COMPRESSOR STATION
Columbia Gas Transmission LLC
P. O. Box 1273
Charleston, WV 25325-1273

RE: PRELIMINARY PROPOSED AIR POLLUTION TITLE V
Permit Type: Renewal

Dear Permit Holder:

Enclosed is the Ohio EPA Preliminary Proposed Title V permit that was issued in draft form on 10/4/2010. The comment period for the Draft permit has ended. We are now ready to submit this permit to U.S. EPA for approval.

We are submitting this for your review and comment. If you do not agree with the Preliminary Proposed Title V permit as written, you now have the opportunity to raise your concerns. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link. Comments will be accepted as a marked-up copy of the permit or in narrative format. Any comments must be sent to the following within 14 days of your receipt of this letter:

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

and

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 43087

If you believe that it is necessary to have an informal conference with us, then, as part of your written comments, you should request a conference concerning the written comments.

If comments are not submitted within 14 days of your receipt of this letter, we will forward the proposed permit to U.S. EPA for approval. All comments received will be carefully considered before proceeding with the proposed permit.

Sincerely,

Michael W. Ahern

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

Cc: Ohio EPA DAPC, Northeast District Office

Response to Comments

Response to comments for: Title V Permit

Facility ID:	0238000049
Facility Name:	HOLMES COMPRESSOR STATION
Facility Description:	
Facility Address:	Columbia Gas Transmission Corporation 1700 MacCorkle Avenue, S.E. Charleston, WV 25325 Holmes County
Permit #:	P0106460, Renewal
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the Holmes County Hub on 10/14/2010. The comment period ended on 11/13/2010.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

1. Topic: **Condition C.2.f)(1)a. <u>Applicable Compliance Method</u>:**
   Page 25 of 33

   a. **Comment:** Columbia Gas Transmission – Holmes Compressor Station (Columbia agrees with the use of USEPA reference document AP-42 emission factors to demonstrate compliance with particulate emission limitation for emission units B001, B003, B004, & B005 as referenced in condition C.2.f)(1)a. However, the AP-42 reference for the particulate emission factor is incorrect. The numerical value in lb/mmBtu is correct just the reference is incorrect. Columbia requests changing this section as follow:

   Proposed Change
   <u>Applicable Compliance Method:</u>

   Compliance shall be based upon an emission factor of 0.0384 lb/mmBtu. This emission factor is specified in USEPAreference document AP-42, Fifth Edition, Table 3.2-1, Uncontrolled Emission Factors for -Stroke Lean-Burn (7/00)

b. **Response**: This condition will be changed as recommended.

2. Topic: **Condition C.3.d)(6)a.**
Page 30 of 33

a. **Comment:** Columbia requests the removal of the word "was" from this condition.

Proposed Change:

a. The name of the organic material used.

b. **Response:** This condition will be changed as recommended.

3. Topic: **Condition C.1.e)(1)**
Page 30 of 33

a. **Comment:** This condition requires the use of Ohio EPA's eBusiness Center: Air Services online web portal for submission of all notifications and reports, unless other arrangements have been approved. This reporting requirement does not appear in any of the other reporting requirement sections of this Draft Title V Permit. Columbia requests the inclusion of this reporting requirement in Condition C.1.e) and Condition C.2.e) to provide for consistency in reporting.

b. **Response:** A condition of "unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services on line web portal" will be added in to Section B, Facility-wide Terms and Conditions. All references to Standard Terms and Conditions in reporting sections will be removed. Section C.3.e)(4) will also be removed.

Ohio | Environmental Protection Agency

PRELIMINARY PROPOSED

Division of Air Pollution Control
Title V Permit
for
HOLMES COMPRESSOR STATION

Facility ID:	0238000049
Permit Number:	P0106460
Permit Type:	Renewal
Issued:	11/17/2010
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Ohio Environmental Protection Agency

Division of Air Pollution Control
Title V Permit
for
HOLMES COMPRESSOR STATION

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Authorization

Facility ID: 0238000049
Facility Description:
Application Number(s): A0038075
Permit Number: P0106460
Permit Description: Renewal Title V permit for Holmes Compressor Station, which includes four compressors, two dehydration units consisting of a reboiler and contact tower, one emergency generator, one line heater, and associated tankage. Dehydrator emissions are controlled by a flare.
Permit Type: Renewal
Issue Date: 11/17/2010
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number: P0084660

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

HOLMES COMPRESSOR STATION
Columbia Gas Transmission Corporation
1700 MacCorkle Avenue, S.E.
Charleston, WV 25325

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

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 43087
(330)425-9171

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:

(1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions

(2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions

(3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting

(4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(Authority for term: ORC 3704.036(A))

2. Monitoring and Related Record Keeping and Reporting Requirements

a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

(1) The date, place (as defined in the permit), and time of sampling or measurements.

(2) The date(s) analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) The operating conditions existing at the time of sampling or measurement.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

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

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

c) The permittee shall submit required reports in the following manner:

(1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

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

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

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

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

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

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

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

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

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.
If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.
See A.29 below if no deviations occurred during the quarter.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

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

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.
In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.
These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.
If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

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

(4) Each written report shall be signed by a responsible official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."

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

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

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

3. Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

4. Risk Management Plans

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. § 7401 et seq. ("Act"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or

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

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

5. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.
(Authority for term: OAC rule 3745-77-07(A)(5))

6. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
(Authority for term: OAC rule 3745-77-07(A)(6))

7. General Requirements

a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with Standard Term and Condition A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d) This permit does not convey any property rights of any sort, or any exclusive privilege.

e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:

(1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or

(2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or

(3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminent sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.
(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

8. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.
(Authority for term: OAC rule 3745-77-07(A)(8))

9. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.
(Authority for term: OAC rule 3745-77-07(A)(9))

10. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.
(Authority for term: OAC rule 3745-77-07(A)(10))

11. Reopening for Cause

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

a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

12. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.
(Authority for term: OAC rule 3745-77-07(B))

13. Compliance Requirements

a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

(1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

(2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.

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

(4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c) The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

(1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

(2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:

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

(2) Compliance certifications shall include the following:

a. An identification of each term or condition of this permit that is the basis of the certification.

b. The permittee's current compliance status.

c. Whether compliance was continuous or intermittent.

d. The method(s) used for determining the compliance status of the source currently and over the required reporting period.

e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

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

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

14. Permit Shield

a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

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

15. Operational Flexibility

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

or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).
(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

16. Emergencies

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

17. Off-Permit Changes

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

a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.

b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.

c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).

d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

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

18. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by

law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.
(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

Each IEU that has one or more applicable requirements shall comply with those applicable requirements.
(Authority for term: OAC rule 3745-77-07(A)(1))

20. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.
(Authority for term: OAC rule 3745-77-07(A)(1))

21. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.
(Authority for term: OAC rule 3745-77-07(A)(1))

22. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the responsible official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the responsible official that the emissions unit was permanently shut down.
After the date on which an emissions unit is permanently shut down (i.e., that has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.
No emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.
(Authority for term: OAC rule 3745-77-01)

23. Title VI Provisions

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

a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.

b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.

c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11))

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

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

25. Records Retention Requirements Under State Law Only

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

26. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine

whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.
(Authority for term: OAC rule 3745-77-07(C))

27. Scheduled Maintenance/Malfunction Reporting

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

28. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.
(Authority for term: OAC rule 3745-77-01(C))

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

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.
The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or

b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; or

c) where the company's responsible official has certified that an emissions unit has been permanently shut down.

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

   a) B.6.

2. The following emissions units contained in this permit are subject to 40 CFR Part 63, Subpart HHH, National Emission Standards for Hazardous Air Pollutants for Natural Gas Transmission and Storage Facilities: B008 and B009. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://ecfr.gpoaccess.gov or by contacting the appropriate Ohio EPA District office or local air agency.

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

   [40 CFR 63.1270]

3. The following emissions units contained in this permit are subject to 40 CFR Part 63, Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE), per 40 CFR §63.6585: B001, B003, B004, B005, and B010. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://ecfr.gpoaccess.gov or by contacting the appropriate Ohio EPA District office or local air agency.

   [40 CFR 63.6585]

4. The following emissions units located at this facility are subject to a case-by-case MACT determination pursuant to section 112(j) of the Clean Air Act (CAA) due to the June 8, 2007 D.C. Circuit Court of Appeals decision to vacate the Boiler MACT (40 Code of Federal Regulation Part 63, Subpart DDDDD, National Emission Standards for Hazardous Air Pollutants for industrial, commercial, and institutional Boilers and Process heaters).

EU ID	Operations, Property and/or Equipment Description
B002	Kweanee 3.75 mmBTU/hr natural gas-fired heating system boiler.
B006	Heater #1. Thermo-Flux model 3400CH, 3.8 mmBTU/hr natural gas-fired indirect pipeline heater (permit to install 02-3594 issued on January 13, 1988)
B007	Heater #2. Thermo-Flux model 5000CH, 5.5 mmBTU/hr natural gas-fired indirect pipeline heater (permit to install 02-3594 issued on January 13, 1988)
B008	Triethylene glycol natural gas dehydration system with a 1.2 mmBTU/hr natural gas-fired boiler.
B009	Triethylene glycol natural gas dehydration system with a 0.8 mmBTU/hr natural gas-fired boiler.

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

   [40 CFR 63.52(A)(2)]

5. The following insignificant emissions units at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within the identified permit to install for the emissions unit. The insignificant emissions units listed below are subject to one or more applicable requirements contained in a permit to install or in the SIP- approved versions of OAC chapters 3745-17, 3745-18, and 3745-21.

EU ID	Operations, Property and/or Equipment Description
B006	Heater #1. Thermo-Flux model 3400CH, 3.8 mmBTU/hr natural gas-fired indirect pipeline heater (permit to install 02-3594 issued on January 13, 1988)
B007	Heater #2. Thermo-Flux model 5000CH, 5.5 mmBTU/hr natural gas-fired indirect pipeline heater (permit to install 02-3594 issued on January 13, 1988)

[OAC rule 3745-77-07(A)(13)]

6. The following insignificant emissions units located at this facility are exempt from permit requirements because they are not subject to any applicable requirements or because they meet the “de minimis” criteria established in OAC rule 3745-15-05:

EU ID	Operations, Property and/or Equipment Description
B002	Kweanee 3.75 mmBTU/hr natural gas-fired heating system boiler.
F001	Various fugitive VOC emissions points
T001	Dual 6,000 gallon underground storage tanks for gas pipeline liquids (B09-B10).
T002	Dual 6,000 gallon underground storage tanks for gas pipeline liquids (B11-B12).
T003	Dual 6,000 gallon underground storage tanks for gas pipeline liquids (B13-B14).
T004	Lube oil tank, 4400 gallon, aboveground, (A01)
T005	Pipeline liquids tank, 1260 gallon, aboveground, (A02).
T006	Antifreeze tank, 8000 gallon aboveground, (A08).
T007	Used Glycol Tank, 8000 gallon UST, (B02).
T008	Methanol tank, 8000 gallon UST, (B03).
T009	Glycol tank, 10,000 gallon UST, (B07).
T010	Water mixture tank, 2700 gallon UST, (B08).
T011	Used oil tank, 718 gallon, in basement of engine room, (C03)
T012	Glycol, 15,200 gallon storage tank, aboveground, (A06).
T013	GASOLINE STORAGE TANK. - 550 gallon

[OAC rule 3745-15-06]

7. Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

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

C. Emissions Unit Terms and Conditions

1. B010, RECIP ENGINE/GENERATOR #103G1

Operations, Property and/or Equipment Description:

Emergency generator (#103G1). Waukesha F18GL natural gas-fired, 4 stroke, lean burn, reciprocating engine, having a maximum capacity of 3.0 mmBTU/hr (335 HP).

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-11(B)(5)(a)	Particulate emissions shall not exceed 0.310 lb/mmBtu of actual heat input.
b.	OAC rule 3745-17-07(A)	Visible particulate emissions from the exhaust stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
c.	OAC rule 3745-18-06(G)	See b)(2)a.
d.	OAC rule 3745-31-05(A)(3) (PTI 02-7836 issued on December 15, 1993)	See b)(2)b, c)(1) and c)(2).
e.	40 CFR Part 63, Subpart ZZZZ	See b)(2)c.

(2) Additional Terms and Conditions

a. In accordance with 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.

b. The emissions from this emissions unit shall not exceed the following:

i. 1.48 tons per year of nitrogen oxides (NO_X);

ii. 0.74 ton per year of carbon monoxide (CO); and

iii. 0.37 ton per year of volatile organic compounds (VOC).

c. The emissions unit located at this facility is subject to 40 Code of Federal Regulations (CFR) Part 63, Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE), per 40 CFR 63.6585. In accordance with 40 CFR 63.6590(b)(3), this emissions unit does not have to meet the requirements of 40 CFR Part 63, Subpart ZZZZ, and no initial notification under 40 CFR Part 63, Subpart A is necessary.

c) Operational Restrictions

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

[OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]

(2) This emissions unit shall be operated no more than 1,000 hours per year.

[OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

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

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

(2) The permittee shall maintain records of the total number of hours each month that this emissions unit was in operation (i.e., engine firing natural gas and driving the auxiliary electrical generator).

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

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit.

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

(2) The permittee shall submit annual reports to the Ohio EPA, Northeast District Office that summarize the monthly and annual hours of operation for this emissions unit. The reports shall be submitted by February 15 of each year for the engine operations and shall cover the previous calendar year operation.

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

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:

Particulate emissions shall not exceed 0.310 lb/mmBtu of actual heat input.

Applicable Compliance Method:

Compliance shall be based upon an emission factor of 0.00991 lb/mmBtu. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Table 3.2-2, Uncontrolled Emission Factors for 4-Stroke Lean-Burn Engines (7/00).

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

[OAC rule 3745-17-03(B)(10) and OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

Visible particulate emissions from the exhaust stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

Compliance shall be demonstrated through visible emission observations performed in accordance with the method and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(1).

No visible emission observations are specifically required to demonstrate compliance with these emission limitations but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

[OAC rule 3745-17-03(B)(1) and OAC rule 3745-77-07(C)(1)]

c. Emission Limitation:

The permittee shall burn only natural gas in this emissions unit.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1).

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

d. Emission Limitation:

NO_X emissions shall not exceed 1.48 tons per year.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the following equation:

$E_{NOx} = (EF_{NOx})(P)(OT)/(453.59\ gm/lb)(2{,}000\ lbs/ton)$

where:

E_{NOx} = NO_X emissions rate, in tons per year;

EF_{NOx} = emission factor for NO_X emissions, 4.0 gm/hp-hr, manufacturer's guaranteed data;

P = maximum horsepower rating for the engine = 335 hp; and

OT = actual operating hours, in hours per year, as recorded in d)(2).

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

e. Emission Limitation:

CO emissions shall not exceed 0.74 ton per year.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the following equation:

$E_{CO} = (EF_{CO})(P)(OT)/(453.59\ gm/lb)(2{,}000\ lbs/ton)$

where:

E_{CO} = CO emissions rate, in tons per year;

EF_{CO} = emission factor for CO emissions, 2.0 gm/hp-hr, manufacturer's guaranteed data;

P = maximum horsepower rating for the engine = 335 hp; and

OT = actual operating hours, in hours per year, as recorded in d)(2).

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

f. Emission Limitation:

VOC emissions shall not exceed 0.37 ton per year.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the following equation:

$E_{VOC} = (EF_{VOC})(P)(OT)/(453.59\ gm/lb)(2{,}000\ lbs/ton)$

where:

E_{VOC} = VOC emissions rate, in ton per year;

EF_{VOC} = emission factor for VOC emissions, 1.0 gm/hp-hr, manufacturer's guaranteed data;

P = maximum horsepower rating for the engine = 335 hp; and

OT = actual operating hours, in hours per year, as recorded in d)(2).

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

g. Emission Limitation:

This emissions unit shall be operated no more than 1,000 hours per year.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(2).

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

g) Miscellaneous Requirements

(1) None.

2. Emissions Unit Group - 1500 hp Engines: B001, B003, B004, B005,

EU ID	Operations, Property and/or Equipment Description
B001	Cooper-Bessemer GMWA-6 natural gas-fired, 2-stroke, lean burn, reciprocating pipeline compressor engine, having a maximum capacity of 13.9 mmBTU/hr (1,500 HP). (Compressor #10301 - B001)
B003	Cooper-Bessemer GMWA-6 natural gas-fired, 2-stroke, lean burn, reciprocating pipeline compressor engine, having a maximum capacity of 13.9 mmBTU/hr (1,500 HP). (Compressor #10302 - B003)
B004	Cooper-Bessemer GMWA-6 natural gas-fired, 2-stroke, lean burn, reciprocating pipeline compressor engine, having a maximum capacity of 13.9 mmBTU/hr (1,500 HP). (Compressor #10303 - B004)
B005	Cooper-Bessemer GMWA-6 natural gas-fired, 2-stroke, lean burn, reciprocating pipeline compressor engine, having a maximum capacity of 13.9 mmBTU/hr (1,500 HP). (Compressor #10304 - B005)

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-11(B)(5)(b)	Particulate emissions shall not exceed 0.062 lb/mmBtu of actual heat input.
b.	OAC rule 3745-17-07(A)	Visible particulate emissions from the exhaust stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
c.	OAC rule 3745-18-06(G)	See b)(2)a.
d.	40 CFR Part 63, Subpart ZZZZ	See b)(2)b.

(2) Additional Terms and Conditions

a. In accordance with OAC rule 3745-18-06(A), these emissions units are exempt from OAC rule 3745-18-06(G) during any calendar day in which natural gas is the only fuel burned.

b. The emissions units B001, B003, B004, and B005 located at this facility are subject to 40 Code of Federal Regulations (CFR) Part 63, Subpart ZZZZ,

National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE), per 40 CFR 63.6585. In accordance with 40 CFR 63.6590(b)(3), these emissions units do not have to meet the requirements of 40 CFR Part 63, Subpart ZZZZ, and no initial notification under 40 CFR Part 63, Subpart A is necessary.

c) Operational Restrictions

(1) The permittee shall burn only natural gas in these emissions units.

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

d) Monitoring and/or Recordkeeping Requirements

(1) For each day during which the permittee burns a fuel other than natural gas in any of these emissions units, the permittee shall maintain a record of the types and quantities of fuel burned in the emissions unit.

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

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in any of these emissions units.

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

f) Testing Requirements

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

a. <u>Emission Limitation:</u>

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

<u>Applicable Compliance Method:</u>

Compliance shall be based upon an emission factor of 0.0384 lb/mmBtu. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Table 3.2-1, Uncontrolled Emission Factors for 2-Stroke Lean-Burn Engines (7/00).

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

[OAC rule 3745-17-03(B)(10) and OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

Visible particulate emissions from the exhaust stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

Compliance shall be demonstrated through visible emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(1).

No visible emission observations are specifically required to demonstrate compliance with these emission limitations but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

[OAC rule 3745-17-03(B)(1) and OAC rule 3745-77-07(C)(1)]

c. Emission Limitation:

The permittee shall burn only natural gas in these emissions units.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1).

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

g) Miscellaneous Requirements

(1) None.

3. Emissions Unit Group - Dehydrator System: B008, B009,

EU ID	Operations, Property and/or Equipment Description
B008	Maloney-Crawford triethylene glycol natural gas dehydration system which includes an absober tower, a regenerator with a 1.2 mmBTU/hr natural gas-fired boiler (BLR1) and a FLIP1-Natco SHV-4 2.27 mmBTU/hr flare. (TEG DEHY #1 - B008)
B009	Maloney-Crawford triethylene glycol natural gas dehydration system which includes an absober tower, a regenerator with a 0.8 mmBTU/hr natural gas-fired boiler (BLR2) and a FLIP1-Natco SHV-4 2.27 mmBTU/hr flare. (TEG DEHY #2 - B009)

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-21-07(G)(2)	Exempt. See b)(2)a and b)(2)b.
b.	OAC rule 3745-17-07(A)	Visible particulate emissions from the exhaust stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
c.	OAC rule 3745-17-10(B)	Particulate emissions from the regenerator exhaust stack shall not exceed 0.020 lb/mmBtu of actual heat input.
d.	OAC rule 3745-31-05(A)(3) (PTI 02-3810 issued on May 11, 1988)	See c)(1).
e.	40 CFR 60.18(b)	See c)(2), c)(3), c)(4) and c)(5).
f.	40 CFR Part 63, Subpart HHH (40 CFR 63.1270-1286)	See b)(2)c.
g.	40 CFR 63.1 - 15 (40 CFR 63.1274(a)	Table 2 to Subpart HHH of Part 63 – Applicability of General Provisions to Subpart HHH of Part 63 shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

a. These emissions units are designed to use only triethylene glycol which is not a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5).

b. On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety, therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The requirements of amended OAC rule 3745-21-07 do not apply to emissions units that are installed after February 18, 2008.

c. In accordance with 40 CFR 63.1270(a) and (b), emissions units B008 and B009 are glycol dehydration units located at a natural gas transmission and storage facility, and therefore, subject to 40 Code of Federal Regulations (CFR) Part 63, Subpart HHH, National Emission Standards for Hazardous Air Pollutants for Natural Gas Transmission and Storage Facilities. The facility's design maximum natural gas throughput (the flow of gas to the glycol dehydration unit) is less than 283.0 thousand standard cubic meters per day. In accordance with 40 CFR 63.1274(d)(1), the owner or operator is exempt from the requirements of 40 CFR 63.1274(c), except that the records of the determination of facility design maximum natural gas throughput must be maintained as required by 40 CFR 63.1284(d).

c) Operational Restrictions

(1) These emissions units shall be equipped with a flare to control organic compound (OC) emissions. The flare shall be fired with natural gas and shall be operated with at least 95% control efficiency.

[OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]

(2) The flare shall be designed and operated with 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.

[40 CFR 60.18(c)(1) and OAC rule 3745-77-07(A)(1)]

(3) The flare shall be operated with a flame present at all times, as determined by the methods specified in 40 CFR 60.18(f).

[40 CFR 60.18(c)(2) and OAC rule 3745-77-07(A)(1)]

(4) 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).

[40 CFR 60.18(c)(3)(ii) and OAC rule 3745-77-07(A)(1)]

(5) The flare shall be designed and operated with an exit velocity that satisfies the requirements of 40 CFR 60.18.

[40 CFR 60.18(c)(3)(ii) and OAC rule 3745-77-07(A)(1)]

(6) The flare shall be operated at all times when emissions may be vented to it.

[40 CFR 60.18(e) and OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall monitor the flare to ensure that it is operated and maintained in conformance with manufacturer's specifications.

[40 CFR 60.18 (d) and OAC rule 3745-77-07(C)(1)]

(2) The presence of a flare pilot flame shall be monitored using a thermocouple or any other equivalent device to detect the presence of a flame.

[40 CFR 60.18(f)(2) and OAC rule 3745-77-07(C)(1)]

(3) The permittee shall record the following information each month:

a. all periods during which there was no pilot flame; and

b. the operating times for the flare, monitoring equipment, and the associated emissions units.

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

(4) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the exhaust stacks of regenerators 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 emissions incident; and

e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions 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.

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

(5) For each day during which the permittee burns a fuel other than natural gas in the regenerator, the permittee shall maintain a record of the types and quantities of fuel burned in the emissions unit.

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

(6) For each day during which any organic material other than triethylene glycol was used in these emissions units, the permittee shall maintain the following record:

a. the name of the organic material used;

b. whether it is photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5); and

c. the quantity of the organic material employed in the emissions unit.

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

(7) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart HHH, including the following section:

63.1284(d)(1)	Record keeping requirements for emissions units exempt from control requirements under 63.1274(d) – NOTE: The company satisfies this requirement by maintaining the facility design maximum natural gas throughput (in terms of natural gas flow rate to the glycol dehydration unit per day).

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. each day when a fuel other than natural gas was burned in these emissions units; and

b. each day during which any organic material other than triethylene glycol was used in the emissions units.

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

(2) The permittee shall submit semiannual written reports that identify the following:

a. all periods during which the flare or pilot flame was not functioning properly, and the emissions units were not shut down; and

b. all days during which any visible particulate emissions were observed from the stack serving the emissions unit, and describe any corrective actions taken to minimize or eliminate the visible particulate emissions.

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

f) Testing Requirements

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

a. Emission Limitation:

Visible particulate emissions from the exhaust stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Methods:

Compliance shall be demonstrated through visible emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(1).

No visible emission observations are specifically required to demonstrate compliance with these emission limitations but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

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

b. Emission Limitation:

Particulate emissions from the regenerator exhaust stack shall not exceed 0.020 lb/mmBtu of actual heat input.

Applicable Compliance Method:

Compliance shall be determined by multiplying an emission factor of 1.9 pounds of particulate per million standard cubic foot by the emissions unit's maximum hourly natural gas firing capacity (0.0012 million standard cubic foot per hour) and dividing by the emissions unit's rated heat input capacity (1.2 mmBut/hr). The emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollutant Emission Factors, Section 1.4, Table 1.4-2 (7/98).

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with the methods and

procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and OAC rule 3745-17-03(B)(9).

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

c. Emission Limitation:

The flare shall be operated with at least 95% control efficiency.

Applicable Compliance Method:

If the flare complies with the control requirements specified in c)(1) through c)(6), compliance with the 95% control efficiency requirement shall be assumed.

[OAC rule 3745-15-04(A)]

d. Emission Limitation:

No visible emissions from the flare except for periods not to exceed a total of 5 minutes during any 2 consecutive hours.

Applicable Compliance Method:

Compliance shall be demonstrated through visible emission observations performed in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Method 22.

No visible emission observations are specifically required to demonstrate compliance with these emission limitations but, if appropriate, may be required pursuant to OAC rule 3745-15-04 (A).

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

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

63.1282(a)(1)	Determination of natural gas flow rate to a glycol dehydration unit

g) Miscellaneous Requirements

(1) None.