



State of Ohio Environmental Protection Agency

RE: DRAFT PERMIT TO INSTALL CERTIFIED MAIL
COLUMBIANA COUNTY

Street Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:
Lazarus Gov.
Center

Application No: 02-13883

DATE: 4/19/00

Brinker Compressor Station
P. Michael Hoffman
1700 MacCorkle Ave SE
Charleston, WV 25325-1273

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of \$400 will be due. Please do not submit any payment now.

The Ohio EPA is urging 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. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

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

CC: USEPA
WV

NEDO
PA

Eastgate Dev & Trans Study



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install

Issue Date: To be entered upon final issuance

DRAFT PERMIT TO INSTALL 02-13883

Application Number: 02-13883
APS Premise Number: 0215050202
Permit Fee: **To be entered upon final issuance**
Name of Facility: Brinker Compressor Station
Person to Contact: P. Michael Hoffman
Address: 1700 MacCorkle Ave SE
Charleston, WV 25325-1273

Location of proposed air contaminant source(s) [emissions unit(s)]:

**5213 Leetonia Rd
Leetonia, Ohio**

Description of proposed emissions unit(s):

TEG 20 mmscf/hr Natural Gas Dehydration Unit with 0.75 mmBtu/hr reboiler controlled by a KALDAIR CA3 0.22 mmBtu/hr Flare (P001).

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Brinker Compressor Station

Facility ID: 0215050202

PTI Application: 02-13883

Issued: To be entered upon final issuance

Part I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install General Terms and Conditions

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, 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.
- 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 of federally enforceable 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 emission limitations, operational restrictions, and control device operating parameter limitations, 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 made to the appropriate Ohio EPA District Office or local air agency. 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. See B.11 below if no deviations occurred during the quarter.

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- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements 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. 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 shall be submitted pursuant to 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 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

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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. The permittee shall pay all applicable Permit To Install fees within 30 days after the issuance of this Permit To Install.

8. 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

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shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this 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 ORC section 3704.08.
 - 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.

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10. Permit To Operate Application

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the source(s) covered by this permit.

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B. State Only Enforceable Permit To Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

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 of state-only enforceable 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 state-only required 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. 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.

4. 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.

5. Termination of Permit To Install

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This permit to install shall terminate within eighteen months of the effective date of the permit to install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

6. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities prove to be inadequate or cannot meet applicable standards.

7. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

8. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

9. Best Available Technology

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As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

10. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit To Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

11. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable 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.

C. Permit To Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	14.1

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Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

None

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

**Brink
PTI A**

Emissions Unit ID: P001

Issued: To be entered upon final issuance

**Part III - SPECIAL TERMS AND
CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P001 - TEG 20mmscf/hr Natural Gas Dehydration Unit with 0.75 mmBtu/hr reboiler controlled by a KALDAIR CA3 0.22 mmBtu/hr FLARE.	OAC rule 3745-31-05(A)(3)	Emission of VOC from this emissions unit shall not exceed 3.23 lbs/hr and 14.1 TPY.
	OAC rule 3745-21-07(G)	Particulate emissions from this emissions unit shall not exceed 0.020 lb/mmBtu of actual heat input.
	OAC rule 3745-17-07(A)	See A.I.2.a. below. Less stringent than visible emissions limit found in 40 CFR 60.18 (see A.2.2.c. below).

2. Additional Terms and Conditions

- 2.a The dehydrator (TEGDHY #1/P001) is designed to use only glycol which is not a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5).
- 2.b This emissions unit shall be equipped with a flare to control organic compound emissions. The flare shall be fired with natural gas and shall be operated with a minimum 95% destruction efficiency.

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- 2.c** The flare shall be designed and operated in a manner that will ensure no visible emissions, as determined by 40 CFR 60.18(f), except for periods not to exceed a total of five (5) minutes during any two consecutive hours.
- 2.d** The flare shall be operated at all times when emissions may be vented to it, as determined by methods specified in 40 CFR 60.18(f).
- 2.e** The flare shall be used only when the net heating value of the gas being combusted is two hundred Btu/scf of greater. The net heating value of the gas being combusted shall be determined by methods specified in 40 CFR 60.18.
- 2.f** The flare shall be designed for and operated with an exit velocity that satisfies the requirements of 40 CFR 60.18.

II. Operational Restrictions

- 1. A pilot flame shall be maintained at all times in the flare's pilot burner.

III. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall properly install, operate, and maintain a device (thermocouple or other equivalent device) to continuously monitor the pilot flame when the emissions unit is in operation. The monitoring device and any recorder associated with it shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual.
- 2. The permittee shall record the following information each month:
 - a. all periods during which there is no pilot flame; and
 - b. the operating times for the flare, monitoring equipment, and the associated emissions unit.
- 3. The permittee shall also record, on a monthly basis, the following specific information relative to the operational characteristics of the flare (per 40 CFR 60.18):
 - a. the average heat content of the dehydrator exhaust gas being directed to/controlled by the flare; and

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Emissions Unit ID: P001

- b. the exit velocity of the flare exhaust, per equation found in 40 CFR 60.18.
4. The permittee shall record when a fluid, other than glycol, is used in the dehydrator.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all periods during which the pilot flame or control flare was not functioning properly and the emissions unit was not shut down. These reports shall include the date, time, and duration of each such incident.
2. The permittee shall report the use of any material other than glycol in this emissions unit within 30 days after the occurrence.

Brink**PTI A**

Emissions Unit ID: P001

Issued: To be entered upon final issuance**V. Testing Requirements**

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

- 1.a Emission Limitation: 95% destruction efficiency of the flare control.

Applicable Compliance Method: If the flare complies with the control requirements specified in A.I.2.c, A.I.2.e. and A.I.2.f of these terms and conditions and the requirements of 40 CFR Part 60.18, it is assumed that compliance with the 95% destruction efficiency will be maintained.

- 1.b Emission Limitation: No visible emissions from the flare.

Applicable Compliance Method: 40 CFR Part 60, Appendix A, Method 22. No visible emissions testing is specifically required to demonstrate compliance with this limit but, if appropriate, may be required pursuant to OAC rule 3745-15-04.

- 1.c Emission Limitation(s): Emissions of VOCs from this emissions unit shall not to exceed 3.23 lbs/hr and 14.1 TPY.

Applicable Compliance Method: Compliance with the specified pollutant emissions limitations shall be determined by employing the Gas Research Institute's simulation program GLYCalc version 3 or equivalent, wet gas analyses of gases from the storage field or transmissions lines associated with this natural gas compressor station, AP-42 emissions factors for products of combustion, operational time for the emissions unit, and an assumed destruction efficiency of 95 % for the flare.

- 1.d Emission Limitation: Particulate emissions from this emissions unit shall not exceed 0.020 lb/mmBtu of actual heat content.

Applicable Compliance Method: Compliance shall be based on emissions factors found in AP-42, 5th Edition, Table 1.4-2 (for emissions units less than 10 mmBtu/hr) and the assumed heat content of natural gas (1000 Btu/cubic foot). If required pursuant to OAC 3745-15-04, the permittee shall demonstrate compliance with the particulate emissions limits of this permit by means of physical testing of the effluent from this emissions unit in accordance with testing procedures listed in 40 CFR Part 60, "Standards of Performance for New Stationary Sources", Appendix A, Method 5, and in OAC 3745-17-03(B)(7).

VI. Miscellaneous Requirements

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Brink

PTI A

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None

Emissions Unit ID: P001

Brink
PTI A

Emissions Unit ID: P001

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B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P001 - TEG 20mmscf/hr Natural Gas Dehydration Unit with 0.75 mmBtu/hr reboiler controlled by a KALDAIR CA3 0.22 mmBtu/hr FLARE.		

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit P001 was evaluated based on both the emissions information and the exhaust systems design parameters for this emissions unit as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

a.. Pollutant: Benzene.

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Emissions Unit ID: P001

TLV (ug/m3): 32000
 Maximum Hourly Emission Rate (lbs/hr): 0.452
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 52.54
 MAGLC (ug/m3): 762

b. Pollutant: Ethylbenzene.

TLV (ug/m3): 434000
 Maximum Hourly Emission Rate (lbs/hr): 0.909
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 105.1
 MAGLC (ug/m3): 10333

c. Pollutant: Hexane.

TLV (ug/m3): 176000
 Maximum Hourly Emission Rate (lbs/hr): 0.0375
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 4.608
 MAGLC (ug/m3): 4190

d. Pollutant: Toluene.

TLV (ug/m3): 188000
 Maximum Hourly Emission Rate (lbs/hr): 0.395
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 46.08
 MAGLC (ug/m3): 4476

e. Pollutant: Xylenes.

TLV (ug/m3): 434000
 Maximum Hourly Emission Rate (lbs/hr): 1.25
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 145.6
 MAGLC (ug/m3): 10333

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used within this emissions unit (dehydration products likely to found in natural gas), or the use of new materials, that would result in

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- the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
3. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.
 4. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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PTI Application: 02 12002

Issued

Facility ID: 0215050202

Emissions Unit ID: P001

NEW SOURCE REVIEW FORM B

PTI Number: 02-13883 Facility ID: 0215050202

FACILITY NAME Brinker Compressor Station

FACILITY DESCRIPTION TEG 20 mmscf/hr Natural Gas CITY/TWP Leetonia
 Dehydration Unit with 0.75 mmBtu/hr
 reboiler controlled by a KALDAIR CA3
 0.22 mmBtu/hr Flare (P001)

SIC CODE 4922 SCC CODE 31000299 EMISSIONS UNIT ID P001

EMISSIONS UNIT DESCRIPTION TEG 20mmscf/hr Natural Gas Dehydration Unit with 0.75 mmBtu/hr reboiler controlled by a KALDAIR CA3 0.22 mmBtu/hr FLARE.

DATE INSTALLED

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	Attainment	3.23 lbs/hr	14.1 tpy	3.23 lbs/hr	14.1 tpy
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? 40 CFR 16.18 NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$35,000

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? XX YES NO

IDENTIFY THE AIR CONTAMINANTS: Benzene, Ethylbenzene, Hexane, Toluene, Xylenes.

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Please describe any hard copy information is being submitted with this recommendation (Please send hard copy information to Pam McGraner, DAPC Central Office - Air Quality Modeling and Planning):

Hard copy information includes emissions calculations, results of air toxic review/modeling, and a copy of the Gas Research Institute computer estimations for emissions from the emissions unit (dehydrator) in question in this PTI.

Please provide any additional permit specific notes as you deem necessary:

Permit application received: June 1, 1999

Information requested from company: June 28, 1999

Information submitted: July 16, 1999

Permit put on hold by engineer due to uncertainty on how to proceed or if permit is required: July 23, 1999

Clarification from Central Office that PTI can be done: March 16, 2000 (permit taken off hold)

Permit To Install Synthetic Minor Write-Up

SYNTHETIC MINOR DETERMINATION

Brinker Compressor Station-PTI #02-13883

A)SOURCE DESCRIPTION:

Columbia Gas Transmission Corp. has requested that a federally enforceable PTI be issued for the dehydrator unit (P001) at their Brinker Compressor Station acknowledging the flare emissions control system installed on this emissions unit as operating in accordance with NSPS standards found at 40 CFR 60.18. The Brinker Compressor Station is a Title V facility (currently has a Final Title V Permit) located in Leetonia, Ohio, in Columbiana county. This new, modern flare (an upgrade of a previously installed flare control) was installed on this dehydrator (P001) in 1995.

B)FACILITY EMISSIONS AND AREA ATTAINMENT STATUS:

Brinker Compressor Station is a Title V facility, primarily for emissions of nitrogen oxides which exceed (actual) 100 TPY. A final Title V Operating Permit was issued for this facility on March 19, 1998. Potential total VOC emissions from the exhaust vent of the ethylene glycol reboiler portion of the dehydrator include several HAPs (benzene, ethylbenzene, hexane, toluene, and xylenes) and amount to approximately 28 TPY. No single HAP emission exceeds 10 TPY nor does any combination of HAPs emissions exceed 25 TPY. Columbiana county is attainment for NOx as well as VOCs.

C)MODIFIED SOURCE EMISSIONS LIMITATIONS:

The primary reason for the need to state specific control/operations requirements for the flare control system on this existing gas transmissions station dehydrator is to provide acknowledgment of federally enforceable control limitations on the HAPs emissions from this emissions unit and, thus, allow this facility to avoid the new MACT standards for Natural Gas Transmission and Storage Facilities found at 40 CFR Part 63, Subpart HHH (issued June 17, 1999). The

NEW SOURCE REVIEW FORM B

PTI Number: 02-13883 Facility ID: 0215050202

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FACILITY DESCRIPTION	TEG 20 mmscf/hr Natural Gas Dehyrdation Unit with 0.75 mmBtu/hr reboiler controlled by a KALDAIR CA3 0.22 mmBtu/hr Flare (P001)	CITY/TWP	Leetonia
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HHH standards, in essence, state that a facility which has a 95% effective flare control system in place on a glycol dehydrator and is meeting the control requirements of 40 CFR 60.18 prior to the applicability date of this MACT standard (June 17, 2000) is exempt from these new regulations. This flare (P001), installed in 1995, is, in fact, operating in accordance with the requirements of 40 CFR 60.18. The only thing missing from the Title V permit requirements for this emissions unit at Brinker Compressor Station is the appropriate control language stating this fact.

D)CONCLUSIONS:

NEDO believes that the dehydrator flare control language stated in this PTI - and being met by Columbia Gas in the operation of the Brinker Station - will satisfy the exemption requirements in MACT standard HHH requirements for this facility and render this source exempt from that MACT.

Please fill in the following for this permit:

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	14.1