



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL
COLUMBIANA COUNTY**

CERTIFIED MAIL

Street Address:

Mailing Address:

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

Lazarus Gov.
Center

Application No: 02-22388

Fac ID: 0215050202

DATE: 1/2/2007

Brinker Compressor Station
Kasey Gabbard
1700 MacCorkle Ave SE
Charleston, WV 25314

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, 43216-1049.

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 **\$200** 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.

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA NEDO EASTGATE DEV & TRANSPORTATION STUDY WV PA

Synthetic Minor Determination and/or Netting Determination

Permit To Install: "02-22388"

A. Source Description

Columbia Gas Transmission Corp., Brinker Compressor Station is a Title V facility located at 5213 Leetonia Road in Leetonia Ohio, in Columbiana County. This facility is involved with natural gas transmission.

B. Facility Emissions and Attainment Status

Brinker Compressor Station is a Title V facility due to the emissions of CO and NOx over 100 tpy. Columbiana County is currently designated attainment for PM 2.5 and basic non-attainment for Ozone (VOC, NOx).

C. Source Emissions

Uncontrolled emissions from P001 are 82.19 tons VOC/yr, 22.22 tons benzene/yr, and 50.62 tons combined HAPs/yr. Controlled emissions by a flare with a 95% control efficiency are 4.11 tons VOC/yr, 1.11 tons benzene/yr and 2.53 combined HAPs/yr. The controlled emissions are the allowable emissions provided in this PTI.

HAPs are restricted by use of the flare achieving 95% control.

D. Conclusion

This synthetic minor PTI replaces the previous synthetic minor PTI issued on 12/12/00. The previous synthetic minor PTI was issued to avoid applicability of 40 CFR 63, HHH.



**Permit To Install
Terms and Conditions**

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

DRAFT PERMIT TO INSTALL 02-22388

Application Number: 02-22388
Facility ID: 0215050202
Permit Fee: **To be entered upon final issuance**
Name of Facility: Brinker Compressor Station
Person to Contact: Kasey Gabbard
Address: 1700 MacCorkle Ave SE
Charleston, WV 25314

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

**5213 Leetonia Rd
Leetonia, Ohio**

Description of proposed emissions unit(s):

Modification of flare monitoring requirements.

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

Laura Powell
Interim Director

Brinker Compressor Station
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Part I - GENERAL TERMS AND CONDITIONS

Facility ID: 0215050202

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

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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. See B.9 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency every six months, 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. If this permit is for an emissions unit located at a Title V facility, then 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.
- d. The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

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

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permittee shall comply with the requirement to register such a plan.

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification
- 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, 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 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.

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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 any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

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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 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 and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. All other terms and conditions of this permit 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.

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- 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.

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 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 ninety (90) days after commencing operation of the source(s) covered by this permit.

11. Best Available Technology

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.

12. 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.

13. Permit-To-Install

A permit-to-install must be obtained pursuant to OAC Chapter 3745-31 prior to "installation" of "any air contaminant source" as defined in OAC rule 3745-31-01, or "modification", as defined in OAC rule 3745-31-01, of any emissions unit included in

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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 shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting 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 (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.)

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. Authorization To Install or Modify

If applicable, authorization to install or modify any new or existing emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of

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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.

5. Construction of New Sources(s)

This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. 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 this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit 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 cannot meet the requirements of this permit or cannot meet applicable standards.

6. 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.

7. 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).

8. Construction Compliance Certification

If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) 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.

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9. 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., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

Brinker Compressor Station**Facility ID: 0215050202****PTI Application: 02-22388****Issued: To be entered upon final issuance****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	4.11
Benzene (a single HAP)	1.11
combined HAPs	2.53
CO	4.88
NOx	1.27

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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

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**

- 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.

Operations, Property, and/or Equipment - (P001) - Natural gas dehydration system rated at 0.83 mmscf/hour equipped with two absorber towers with triethylene glycol, a 1.0 mmBtu/hr Hanover Smith reboiler, and a 2.78 mmBtu/hr NatCo SHV-4 flare with a destruction efficiency of 95 percent.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-02(A)(2)	<p>VOC emissions from the absorber unit shall not exceed 0.94 lb/hr and 4.11 tons/year.</p> <p>Benzene (a single Hazardous Air Pollutant) emissions from the absorber unit shall not exceed 0.25 lb/hr and 1.11 tons/year.</p> <p>Combined HAPs emissions from the absorber unit shall not exceed 0.58 lb/hr and 2.53 tons/year.</p> <p>Emissions from the combustion of natural gas in the reboiler and flare shall not exceed 1.11 lbs carbon monoxide (CO)/hour, 4.88 tons CO/year, 0.29 lb nitrogen oxides (NOx)/hour and 1.27 tons NOx/year.</p> <p>See sections A.I.2.a through A.I.2.f below.</p>
OAC rule 3745-17-07(A)	Visible particulate emissions from the reboiler exhaust stack serving this emissions unit shall not exceed 20% opacity, as a 6-minute average, except for a period of not more than 6 consecutive minutes in any 60-minute period. Visible particulate emissions shall not exceed 60% opacity, as a 6-minute average, at any time.
OAC rule 3745-17-10(B)	Particulate emissions from the reboiler exhaust stack shall not exceed 0.020 lb/mmBtu of actual heat input.
OAC rule 3745-21-07(G)	See section A.I.2.f below.
OAC rule 3745-35-07(B)	Compliance with this rule is achieved by compliance with OAC rule 3745-31-02(A)(2).

2. Additional Terms and Conditions

- 2.a 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 95% destruction efficiency.
- 2.b The flare shall be designed and operated in a manner that will ensure no visible emissions, as determined by 40 CFR 60.18(f), except for periods not to exceed a total of five (5) minutes during any two consecutive hours.
- 2.c The flare shall be operated at all times when emissions may be vented to it, as determined by methods specified in 40 CFR 60.18(f).
- 2.d The flare shall be used 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 methods specified in 40 CFR 60.18(f).
- 2.e The flare shall be designed for and operated with an exit velocity that satisfies the requirements of 40 CFR 60.18.
- 2.f The absorbers are designed to use only glycol, which is not a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5).

II. Operational Restrictions

1. The permittee shall only burn natural gas in the reboiler and in the flare of this emissions unit.
2. The reboiler shall not be operated above its rated capacity of 1.0 mmBtu/hr and the flare shall not be operated above its rated capacity of 2.78 mmBtu/hr.
3. A pilot flame shall be maintained at all times in the flare's pilot burner.
4. Only one absorber may be used at any time.

III. Monitoring and/or Record keeping 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

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- b. the operating times for the flare, monitoring equipment, and the associated emissions unit.
3. To ensure the flare operates within 40 CFR 60.18, the permittee shall maintain flare manufacturer design records including (but not limited to):
- a. average heat content of flare vent exhaust stream calculated from GRI Gly-Calc regenerator vent compositions' calorific value (BTU) including assist gas (if applicable); and
 - b. maximum flare exhaust exit velocity calculated from GRI Gly-Calc regenerator vent flow rate and cross sectional area of flare tip.

Considering this demonstration is derived from the maximum design characteristics of the flare, the permittee is only required to re-evaluate flare operation per 40 CFR 60.18 if the flare or method of operation is modified from the original maximum design specifications.

4. For each day during which the permittee burns a fuel other than natural gas in the reboiler and in the flare, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
5. For each day during which the permittee uses any material other than glycol, the permittee shall maintain a record of the type and quantity of material employed in the absorbers.
6. 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 flare. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed from the flare, the permittee shall also note the following in the operations log:
- a. the color of the emissions;
 - b. the total duration of any visible emission incident; and
 - c. any corrective actions taken to eliminate the visible emissions.
7. 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 reboiler stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed from

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the reboiler stack, the permittee shall also note the following in the operations log:

- a. the color of the emissions;
- b. whether the emissions are representative of normal operations;
- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any visible emission incident; and
- e. any corrective actions taken to minimize or eliminate the visible emissions.

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

IV. Reporting Requirements

1. The permittee shall report the use of any material other than glycol in the absorbers within 30 days after the occurrence.
2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in the reboiler and/or flare. Each report shall be submitted within 30 days after the deviation occurs.
3. The permittee shall submit semiannual 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 and shall be submitted to the Ohio EPA, Northeast District Office, by January 31 and July 31 of each year and shall cover the previous 6-month period.
4. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the flare serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA, Northeast District Office by January 31 and July 31 of each year and shall cover the previous

Emissions Unit ID: P001

6-month period.

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

V. Testing Requirements

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

Applicable Compliance Method:

If the flare complies with the control requirements specified in sections A.1.2.b, A.1.2.d and A.1.2.e 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.

2. Emission Limitation:
VOC emissions from the absorber unit shall not exceed 0.94 lb/hr and 4.11 tons/year.

Applicable Compliance Method:

Compliance with the above emission limitations shall be determined by employing the Gas Research Institute's simulation program GLY Calc version 4 or equivalent, wet gas analyses of the gases from the storage field or transmission lines associated with the natural gas compressor station, AP-42 emission factors for products of combustion, operational time for the emissions unit, and an assumed destruction efficiency of 95% for the flare.

3. Emission Limitation:
Benzene (a single Hazardous Air Pollutant) emissions from the absorber unit shall not exceed 0.25 lb/hr and 1.11 tons/year.

Applicable Compliance Method:

Compliance with the above emission limitations shall be determined by employing the Gas Research Institute's simulation program GLY Calc version 4 or equivalent, wet gas analyses of the gases from the storage field or transmission lines associated with the natural gas compressor station, AP-42 emission factors for products of combustion, operational time for the emissions unit, and an assumed destruction efficiency of 95% for the flare.

4. Emission Limitation:
Combined HAPs emissions from the absorber unit shall not exceed 0.58 lb/hr and 2.53 tons/year.

Emissions Unit ID: P001

Applicable Compliance Method:

Compliance with the above emission limitations shall be determined by employing the Gas Research Institute's simulation program GLY Calc version 4 or equivalent, wet gas analyses of the gases from the storage field or transmission lines associated with the natural gas compressor station, AP-42 emission factors for products of combustion, operational time for the emissions unit, and an assumed destruction efficiency of 95% for the flare.

5. Emission Limitation:

Emissions from the combustion of natural gas in the reboiler and flare shall not exceed 1.11 lbs carbon monoxide (CO)/hour, 4.88 tons CO/year, 0.29 lb nitrogen oxides (NOx)/hour and 1.27 tons NOx/year.

Applicable Compliance Method:

CO and NOx emissions from the combustion of natural gas in the reboiler and flare are calculated using the maximum ratings of the reboiler and flare, and 8,760 hours per year. As long as the maximum ratings are not exceeded, compliance with the emission limitations is demonstrated.

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6. Emission Limitation:

Visible particulate emissions from the reboiler exhaust stack serving this emissions unit shall not exceed 20% opacity, as a 6-minute average, except for a period of not more than 6 consecutive minutes in any 60-minute period. Visible particulate emissions shall not exceed 60% opacity, as a 6-minute average, at any time.

Applicable Compliance Method:

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

7. Emission Limitation:

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

Applicable Compliance Method:

Method 22 of 40 CFR Part 60, Appendix A shall be used to determine the compliance of flares with the visible particulate emission provisions. The observation period is 2 hours and shall be used according to Method 22.

8. Emission Limitation:

Particulate emissions from the reboiler 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 lbs of particulates/mmscf by the emissions unit's maximum hourly natural gas firing capacity of 0.001 mmscf/hr and dividing by the emissions unit's rated heat input capacity of 1.0 mmBtu/hr.

The emission factor of 1.9 lbs particulates/mmscf is found in U.S.EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-2 (7/98).

The maximum hourly natural gas firing capacity is calculated by dividing the rated maximum heat input capacity of 1.0 mmBtu/hr by the heat content of the natural gas reported as 1,000 Btu/scf.

If required pursuant to OAC rule 3745-15-04, the permittee shall demonstrate compliance with the particulate emission limitation of this permit by means of

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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, Methods 1 through 5, and in OAC rule 3745-17-03(B)(9).

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VI. Miscellaneous Requirements

1. The terms and conditions in this Permit-to-Install supercede the terms and conditions in PTI 02-13883 issued on December 12, 2000 for this emissions unit.

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.

Operations, Property, and/or Equipment - (P001) - Natural gas dehydration system rated at 0.83 mmscf/hour equipped with two absorber towers with triethylene glycol, a 1.0 mmBtu/hr Hanover Smith reboiler, and a 2.78 mmBtu/hr NatCo SHV-4 flare with a control efficiency of 95 percent.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

Brinker Compressor Station

DTI Application: 02 22288

Facility ID: 0215050202

Emissions Unit ID: P001

None

VI. Miscellaneous Requirements

None