



State of Ohio Environmental Protection Agency

STREET ADDRESS:

1800 WaterMark Drive  
Columbus, OH 43215-1099

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

MAILING ADDRESS:

P.O. Box 1049  
Columbus, OH 43216-1049

Re: Permit to Install  
Holmes County  
Application No: 02-1482

CERTIFIED MAIL

September 3, 1997

MILEY COMPRESSOR STATION  
P. MICHAEL HOFFMAN  
1700 MACCORKLE AVENUE SE  
CHARLESTON, WV 25325

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions I urge you to read it carefully.

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.

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

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

Very truly yours,

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

cc: US EPA  
NORTHEAST DISTRICT OFFICE, DAPC



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## Permit to Install Terms and Conditions

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Application No. 02-1482  
APS Premise No. 0238000050  
Permit Fee: \$300.00

Name of Facility: MILEY COMPRESSOR STATION

Person to Contact: P. MICHAEL HOFFMAN

Address: 1700 MACCORKLE AVENUE SE  
CHARLESTON, WV 25325

Location of proposed source(s): 7531 STATE ROUTE 514  
BIG PRAIRIE, OHIO

Description of proposed source(s):  
78 HP/60 KW NAT GAS-FIRE RECIPROCATING ENGINE-GENERATOR SET  
& TEG NATURAL GAS DEHYDRATOR UNIT W/FLARE CONTROL FOR VOCS.

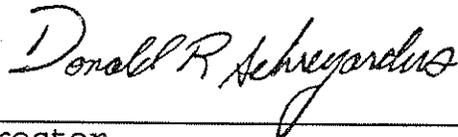
Date of Issuance: September 3, 1997

Effective Date: September 3, 1997

The above named entity is hereby granted a permit to install for the above described source(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 source(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 source(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



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Director

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TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. 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.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCES

The proposed source(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 source(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 Ohio Administrative Code (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)

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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 applicable standards.

#### PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

#### 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.

#### APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

#### 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.

#### PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

#### SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws and regulations.

AIR EMISSION SUMMARY

The air contaminant sources listed below comprise the Permit to Install for MILEY COMPRESSOR STATION located in Holmes County. The sources listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
B006	ONAN-LSG8751, 78 HP/60KW natural gas fired reciprocating engine/generator	Uncontrolled, compliance with OAC 3745-17-11, OAC 3745-18-06, and visible emissions limits in OAC 3745-17-07	3745-31-05 3745-17-11 (B) (5) (a) 3745-18-06 (F) 3745-17-07	PM <sub>10</sub> - 0.25 lb/hr and 1.1 TPY SO <sub>2</sub> - 0.50 lb/hr and 2.19 TPY NO <sub>x</sub> - 1.72 lbs/hr and 7.52 TPY
P001	Triethylene-glycol (TEG) natural gas dehydrator #1 with flare emissions control	Use of a natural gas fired flare to control OC/HAPs emissions with a 95 percent control efficiency	3745-31-05 3745-21-07 (G) 3745-15-06 3745-15-07 40 CFR 60.18	Total OC - 1.55 lbs/hr and 6.79 TPY Toluene - 0.23 lb/hr Xylene - 0.11 lb/hr Benzene - 0.16 lb/hr Total HAPs - 0.55 lb/hr

**SUMMARY**

**TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons/Year</u>
PM <sub>10</sub>	1.10
SO <sub>2</sub>	2.19
NO <sub>x</sub>	7.52
Total OC's*	6.79

(\*Includes Toluene, Xylene, Benzene, and Total HAPs)

**CONSTRUCTION STATUS**

The OEPA Northeast District Office - DAPC shall be notified in writing as to (a) the construction starting date, (b) the construction completion date, and (c) the date the facilities were placed into operation for the following sources: P001 - TEG DEHY 1 flare control.

**RECORD(S) RETENTION AND AVAILABILITY**

All records required by this Permit to Install shall be retained on file for a period of not less than three years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any representative of the Director, for review during normal business hours.

**REPORTING REQUIREMENTS**

Unless otherwise specified, reports required by the Permit to Install need only be submitted to OEPA Northeast District Office - DAPC, 2110 East Aurora Road, Twinsburg, Ohio 44087.

**MALFUNCTION/ABATEMENT**

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the OEPA Northeast District Office - DAPC, 2110 East Aurora Road, Twinsburg, Ohio 44087.

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

**AIR POLLUTION NUISANCES PROHIBITED**

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

**ADDITIONAL SPECIAL TERMS AND CONDITIONS**

**INTRODUCTION**

This PTI covers two emissions units; a 78 HP/60 KW, natural gas-fired engine/generator set and a triethylene glycol (TEG) natural gas dehydrator unit with a natural gas-fired flare emissions control system. Both emissions units are permitted for up to 8760 hours of operation and will constitute part of the Title 5 operating permit for Miley Compressor Station, a natural gas

pipeline transmission facility operated by Columbia Gas Transmission Corp. in Holmes County.

EMISSIONS LIMITATIONS

For B006 (Engine/Generator Set):

- A. Per OAC Rule 3745-17-11(B) (5) (a), particulate emissions from this emissions unit shall not exceed 0.25 pound per million Btu of actual heat input.
- B. Visible particulate emissions from the exhaust stack of this emissions units shall comply with OAC Rule 3745-17-07(A) as follows:
  1. except as specified below, visible emissions from the exhaust stack of this emissions unit shall not exceed twenty (20) percent opacity as a six-minute average; and,
  2. visible particulate emissions from the exhaust stack of this emissions unit may exceed twenty (20) percent opacity, as a six-minute average, for not more than six consecutive minutes in any sixty-minute period, but shall not exceed sixty (60) percent opacity, as a six minute average, at any time.

For P001 (TEG Dehydrator Unit #1 with Flare Control):

- A. The organic compound emissions from this emissions unit shall be limited as follows:
  1. Total Organic Compounds (OC) = 1.55 lbs/hr and 6.79 TPY;
  2. Toluene = 0.23 lb/hr and 1.02 TPY;
  3. Xylene = 0.11 lb/hr and 0.46 TPY;
  4. Benzene = 0.16 lb/hr and 0.70 TPY; and,
  5. Total Hazardous Air Pollutants (HAPs) = 0.55 lb/hr and 2.42 TPY.

ADDITIONAL TERMS and CONDITIONS

For P001 (TEG Dehydrator Unit #1 with Flare Control):

- A. This TEG natural gas dehydrator unit shall employ only a glycol material, a non-photochemically reactive material as defined in OAC Rule 3745-21-01(C) (5), as a water absorption media.
- B. This emissions unit shall be equipped with a flare to control organic compound emissions. This flare shall be fired with natural gas and shall be operated with a minimum destruction efficiency of ninety-five (95) percent.

- 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 minutes during any two consecutive hours.
- 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).
- E. The flare shall be used only when the net heating value of the gas being combusted is two hundred 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).
- F. The flare shall be designed for and operated with an exit velocity that satisfies the requirements of 40 CFR 60.18.

**MONITORING AND/OR RECORDKEEPING REQUIREMENTS**

**For P001 (TEG Dehydrator Unit #1 with Flare Control):**

- A. The permittee shall monitor the flare at all times for the presence of a pilot flame using a thermocouple or any other equivalent device to detect the presence of a flame.
- B. The permittee shall record the following information each month:
  - 1. all periods during which there was no pilot flame; and,
  - 2. the operating times for the flare, monitoring equipment, and associated emissions unit.

**REPORTING REQUIREMENTS**

**For P001 (TEG Dehydrator Unit #1 with Flare Control):**

- A. The permittee shall submit semi-annual deviation (excursion) reports that identify all periods during which the pilot flame or flare was not functioning properly, and the emissions unit was not shut down. The reports shall include the date, time, and duration of each such period, and shall be submitted by January 31 and July 31 of each year and shall cover the previous six calendar months.
- B. The permittee shall report the use of any material other than glycol in this emissions unit within 30 days after the occurrence.

**TESTING REQUIREMENTS**

Compliance with the emission limitation(s) of these terms and conditions listed above shall be determined in accordance with the following method(s):

For B006 (Engine/Generator Set):

A. Emission Limitation:

Particulate emissions from this emissions unit shall not exceed 0.25 pound per million Btu of actual heat input.

Applicable Compliance Method:

AP-42 emission factor, Table 3.2-4.

B. Emission Limitation:

Except as specified below, visible particulate emissions from the exhaust stack of this emissions units shall not exceed twenty (20) percent opacity as a six-minute average. Visible particulate emissions from the exhaust stack of this emissions unit may exceed twenty (20) percent opacity, as a six-minute average, for not more than six consecutive minutes in any sixty-minute period, but shall not exceed sixty (60) percent opacity, as a six minute average, at any time.

Applicable Compliance Method:

OAC Rule 3745-17-03(B)(1).

For P001 (TEG Dehydrator Unit #1 with Flare Control):

A. Emission Limitation:

1. Total Organic Compounds (OC) = 1.55 lbs/hr and 6.79 TPY;
2. Toluene = 0.23 lb/hr and 1.02 TPY;
3. Xylene = 0.11 lb/hr and 0.46 TPY;
4. Benzene = 0.16 lb/hr and 0.70 TPY; and
5. Total HAPs = 0.55 lb/hr and 2.42 TPY.

Applicable Compliance Method:

Pollutant emissions shall be determined by employing the Gas Research Institute's simulation program GLYCalc version 3 or equivalent, wet gas analyses of the gases from the Holmes and Miley storage fields, AP-42 emission factors for products of combustion, and an assumed destruction efficiency of 95 percent for the flare. Emission tests may be required, in accordance with test procedures approved by the Director, to demonstrate compliance with the hourly emission limitations.

B. Emission Limitation:

95 percent destruction efficiency of the flare.

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Applicable Compliance Method:

If operation of the flare complies with the control requirements specified in "Additional Terms and Conditions" listed above, it will be assumed that compliance with the 95 percent control efficiency will be maintained.

C. Emission Limitation:

No visible emissions for flare, as specified above in "Additional Terms and Conditions", item 3, per 40 CFR 60.18(f).

Applicable Compliance Method:

40 CFR Part 60, Appendix A, Reference Method 22.